

EXHIBIT A - PART 1 OF 2

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2806719
 Invoice Date 06/21/21
 Client Matter No. 180333.00004

For Legal Services Rendered Through December 31, 2020 In Connection With:

00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
12/04/20	G. Harper	0.40	Call with Mrs. Wardell re potential new case; call with SStodghill re same; multiple emails with client re case issues
12/08/20	G. Harper	0.30	Call with SStodghill re new case; email with client re case issues
12/09/20	G. Harper	1.20	Multiple emails with client re new case issues; review materials re issues regarding representation; call with SStodghill and firm re same
12/10/20	G. Harper	2.00	Multiple calls and emails with Mrs. Wardell and SStodghill re new case and representation issues; call with firm re same; review materials re case terms
12/15/20	M. Gaddis	4.40	Review [REDACTED] research and review [REDACTED] draft analysis re same; call G. Harper and S. Stodghill to discuss same
12/15/20	G. Harper	1.90	Review and respond to email from client re new matter and issues therein; call with SStodghill re same; review documents and draft correspondence to client re litigation issues; call with MGaddis re legal research needed and case strategy
12/20/20	G. Harper	0.70	Call with SStodghill re new case and things to do; call with CDial re same; review complaint

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12/21/20	C. Dial	1.30	Calls with Geoffrey Harper, Steve Stodghill, and client regarding status of case and document production
12/21/20	G. Harper	3.00	Multiple calls and emails with CDial re new matter and things to do; call with client and former counsel re status of litigation and transfer issues; call with team re things to do; email with team re transfer issues and research needed; review and respond to correspondence from client re [REDACTED] [REDACTED] review complaint; research re dismissal options
12/21/20	S. Stodghill	2.60	Review correspondence from [REDACTED] [REDACTED] review correspondence from [REDACTED] telephone call with G. Harper in preparation for call with K. Wardell re background of case; review correspondence from J. Gallagher re same; review correspondence from K. Wardell re same; review correspondence from G. Harper re same; conference call with K. Wardell, K. Hart and WS Team re transfer of documents; review correspondence from G. Harper re same; review correspondence re same; review materials and correspondence re same; review chronology of time frame related to same; telephone call with G. Harper re review of materials and documents related to same; multiple correspondence re same; review multiple correspondence with G. Harper re same
12/22/20	G. Harper	2.80	Multiple calls and emails with SStodghill re case and things to do; research re new case; gather case file; research re claims; create and edit task list; call with CDial re same; review [REDACTED] call and email with [REDACTED] call with SStodghill re same
12/22/20	S. Stodghill	2.50	Telephone call with G. Harper re analysis of case, potential motion to dismiss and motions for summary judgment, gathering of documents and pleadings and strategic game plan; review

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pleadings, documents and correspondence re same; review correspondence from G. Harper to K. Wardell re strategic issues in case and transfer of file; review correspondence from J. Gallagher re same; review correspondence from K. Wardell re same

12/23/20	S. Stodghill	0.90	Review additional background materials in case; telephone call with G. Harper re same
12/24/20	S. Stodghill	2.50	Telephone call with G. Harper re analysis of case, potential motion to dismiss and motion for summary judgment, gathering of documents and pleadings and strategic game plan; review pleadings, documents and correspondence re same; further review of class action; review correspondence from G Harper to K. Wardell re strategic issues in case and transfer of file; review correspondence from J. Gallagher re same; review correspondence from K. Wardell re same
12/26/20	S. Stodghill	1.20	Correspondence with C. Dial and G. Harper re review of materials and chronology of case and analysis by WS team; telephone call re same; review multiple correspondence re same; review multiple materials re same; memorandum to G. Harper and C. Dial re analysis of case
12/28/20	G. Harper	2.00	Review complaint; research re same; call with team re task list and things to do; research factual claims; arrange for file transfer
12/29/20	G. Harper	2.80	Research facts and law for case strategy regarding complaint; correspond with team re things to do; work on file transfer
12/30/20	C. Dial	0.20	Email with Geoffrey Harper regarding case task list
12/30/20	G. Harper	2.20	Review complaint and begin outline of response to same

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12/31/20	G. Harper	1.90	Work on transfer; research re case strategy and response to complaint
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Total Hours	36.80
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Sub-Total Legal Services	\$38,050.00
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Less 10% Discount	(3,805.00)
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Total for Legal Services	\$34,245.00
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Timekeeper Summary

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	9.70	1,175.00	11,397.50
M. Gaddis	4.40	895.00	3,938.00
G. Harper	21.20	1,035.00	21,942.00
C. Dial	1.50	515.00	772.50
Total Attorney/Other Prof	36.80		38,050.00

Total Due This Invoice	\$34,245.00
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Karen Wardell
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Fort Worth, TX 76104

Invoice # 2806719
Invoice Date 06/21/21
Client Matter No. 180333.00004

Client Remittance Copy

Total Fees	\$34,245.00
Total Disbursements	0.00
Total Due This Invoice	\$34,245.00

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

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Remittance Advice

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For Legal Services Rendered Through January 31, 2021 In Connection With:

00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
01/01/21	G. Harper	1.90	Review complaint; research re same; call with team re task list and things to do; research factual claims; arrange for file transfer
01/03/21	G. Harper	3.70	Review client materials re claims; research re [REDACTED] [REDACTED] research re [REDACTED] [REDACTED]
01/04/21	C. Dial	0.30	Review of previous task lists
01/04/21	C. Dial	0.60	Call with Geoffrey Harper regarding task list
01/04/21	C. Dial	1.00	Draft task list
01/04/21	G. Harper	2.10	Draft email to CDial re things to do and case strategy; call with SStodghill re same; draft and edit task list; call with CDial re same; finalize and serve waiver of summons; call and email with opposing counsel re lawsuit issues and claims; email with team re documents needed from client
01/04/21	S. Stodghill	1.50	Telephone call with G. Harper re multiple issues related to transfer of file and review of documents, correspondence and other materials related to claims and defenses in case; review related materials and correspondence ; review memorandum from G. Harper re [REDACTED] [REDACTED] correspondence with G .Harper re same; review correspondence re deadline to file answer in case; review correspondence re same

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Date	Attorney/Other Prof	Hours	Description
01/05/21	C. Dial	1.10	Review complaint and local rules
01/05/21	C. Dial	0.40	Edit case task list and send to Steve Stodghill and Geoffrey Harper
01/05/21	G. Harper	4.90	Gather materials re case and review same; review docket re claims; call and email with CDial re things to do; multiple emails and calls with SStodghill re same; review task list; edit same; correspond with Mr. Cawyer re various case issues; review and respond to client inquiry re [REDACTED] call with SStodghill re same; review [REDACTED] call with clients re [REDACTED] and options for same; review materials re claims in suit; research re same
01/05/21	S. Stodghill	2.50	Telephone call with G. Harper re transfer of files from Kelly Hart, review of document file, issues in lawsuit, task list and related issues; correspondence with G. Harper and C. Dial re same; review correspondence from C. Dial re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; correspondence with G. Harper and C. Dial re WS analysis of claims for potential motion to dismiss or motion for summary judgment; correspondence with G. Harper and c. Dial re memorandum to client re same; review draft task list and related issues from C. Dial; correspondence with C. Dial re revisions to same; review correspondence from G Harper re same; correspondence with G. Harper re C. Dial re same; correspondence with G. Harper and C. Dial re revisions to same; telephone call with G. Harper re [REDACTED] review correspondence from G. Harper re same; review correspondence re scheduling of call with clients; review correspondence from G. Harper re same; review revised task list

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01/06/21	S. Stodghill	0.60	Review correspondence from C. Dial re issues in case and revised task list; review revised task list; correspondence with C. Dial and G. Harper re same
01/07/21	C. Dial	1.30	Review requirements under local rules
01/07/21	C. Dial	3.40	Review complaint and analyze alleged claims
01/07/21	G. Harper	0.90	Multiple calls and emails with clients re case issues and strategy; review clients documents re same
01/07/21	S. Stodghill	1.50	Telephone call with G. Harper re analysis of case and related issues; review multiple correspondence re same; telephone call re [REDACTED] [REDACTED] review materials re [REDACTED] [REDACTED] review correspondence from C. Dial re revised task list; review correspondence from G. Harper to K. Wardell re same
01/08/21	C. Dial	0.20	Email S. Stodghill and G. Harper review of local rule requirements and certificate of interested persons
01/08/21	G. Harper	2.30	Call with SStodghill re issues with consultant; call with clients re same; review [REDACTED] research re claims in petition
01/08/21	S. Stodghill	3.40	Telephone call with G. Harper in preparation for call with K. Wardell and [REDACTED] [REDACTED] related issues; review memorandum from C. Dial re local research and related issues; review correspondence from C. Dial re same; correspondence with C. Dial re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call to G. Harper re same; telephone call with G. Harper re same; telephone call with G. Harper and K. Wardell in preparation for call [REDACTED]

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			conference call with J. Gallagher, K. Wardell, W. King and G. Harper re [REDACTED]
01/10/21	G. Harper	0.70	Review and respond to correspondence from SStodghill re [REDACTED] review [REDACTED]
01/10/21	S. Stodghill	1.10	Correspondence with G. Harper re [REDACTED] review [REDACTED] materials re guidelines for preservation; telephone call to G. Harper re same; review correspondence from G Harper re [REDACTED] [REDACTED] correspondence with G. Harper re same
01/11/21	G. Harper	0.90	Multiple calls and emails with SStodghill re issues re [REDACTED] call with clients re same; review and respond to email re [REDACTED]
01/11/21	S. Stodghill	2.50	Telephone call with G. Harper re [REDACTED] review [REDACTED] correspondence re [REDACTED] review correspondence from [REDACTED] re scheduling of call; review correspondence from [REDACTED] review correspondence from K. Wardell re same; correspondence with K. Wardell and [REDACTED] re same; review correspondence from G. Harper re [REDACTED] review correspondence from [REDACTED] re [REDACTED] further review background materials, correspondence and documents
01/12/21	G. Harper	1.00	Call with SHS to discuss [REDACTED]; call with team and [REDACTED]
01/12/21	S. Stodghill	1.90	Prepare for call with [REDACTED] and Cook team; correspondence with G. Harper re same; telephone call with G. Harper in preparation for call [REDACTED] review correspondence from J. Gallagher re [REDACTED] review correspondence from K. Wardell re [REDACTED]

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same; correspondence with J. Gallagher re same; review correspondence from G. Harper re same; conference call [REDACTED] WS team and Cook team re [REDACTED] [REDACTED] telephone call with G. Harper re follow-up issues to call [REDACTED] further review and potential revisions to [REDACTED]

01/13/21	S. Stodghill	0.90	Review correspondence from [REDACTED] [REDACTED] correspondence with [REDACTED] review correspondence from A. Davis re same; correspondence with A. Davis re same; prepare protocol [REDACTED] review correspondence from [REDACTED] [REDACTED] correspondence with [REDACTED]
01/14/21	C. Dial	6.60	Research scope of [REDACTED] [REDACTED]
01/14/21	C. Dial	0.50	Call with G. Harper regarding research [REDACTED]
01/14/21	G. Harper	1.80	Call with SStodghill re [REDACTED] call and email with CDial re same and research needed; call with clients re same and materials needed
01/14/21	S. Stodghill	0.90	Review correspondence from J. Gallagher to [REDACTED] [REDACTED] correspondence with G. Harper re same; review correspondence from G. Harper re same; memorandum to G. Harper re [REDACTED] [REDACTED] telephone call with G. Harper re same; prepare for call with Cook legal team
01/15/21	C. Dial	4.70	Research scope of [REDACTED] [REDACTED]
01/17/21	G. Harper	1.90	Prepare for meeting with Cook Board; research re claims in petition

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01/18/21	C. Dial	3.20	Research scope of [REDACTED] [REDACTED] and send findings to G. Harper
01/18/21	G. Harper	2.40	Multiple calls and emails with SStodghill re case strategy and [REDACTED] review research on [REDACTED] draft and edit email to clients re same and things to do; review issues re [REDACTED]
01/18/21	S. Stodghill	1.30	Telephone call with G. Harper re protocol for issues in case and analyzing of case by WS employment lawyers; prepare for call with [REDACTED] [REDACTED] telephone call re [REDACTED] [REDACTED] review correspondence and materials re constitutional issues and employment letter; review correspondence from [REDACTED] review correspondence from G. Harper re same; review correspondence from [REDACTED]
01/19/21	C. Dial	0.90	Apply for admittance to practice in the Northern District of Texas
01/20/21	S. Stodghill	0.20	Telephone call with G. Harper re multiple issues related to defense of case
01/21/21	C. Dial	0.30	Contact G. Harper regarding sponsoring admittance to practice; get P. Thompson to notarize application
01/21/21	G. Harper	1.50	Call with SStodghill re labor and employment issues and case strategy for same; research same; draft and edit email to SStodghill re Cardelle Spangler and expertise with same; email with CDial re motion to dismiss; call with CDial re same and things to do
01/21/21	S. Stodghill	1.20	Review correspondence from G. Harper re motion to dismiss race discrimination claims in case; review materials re same; telephone call with G. Harper re same; telephone call with G. Harper re same; telephone call with S. D'Amore re issues in case; correspondence with G. Harper re issues in

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case; review legal research memorandum re [REDACTED]
 [REDACTED] review correspondence from C. Dial re same; review correspondence from G. Harper re same; correspondence with with G. Harper re issues in case; correspondence with G. Harper re [REDACTED]

01/22/21	G. Harper	2.40	Call with SStodghill re things to do and possible dismissal motions; multiple calls and emails with CSpangler re same and case strategy; research re dismissal options and strategy for same
01/22/21	C. Spangler	1.00	Conference with G. Harper, S. Stodghill re Thomas matter
01/22/21	S. Stodghill	1.90	Telephone call from S. D'Amore re issues in analysis of case; review correspondence from S. D'Amore re same; telephone call to G. Harper re same; telephone call from G. Harper re same; telephone call with G. Harper re same; telephone call to S. D'Amore re same; review materials re C. Spangler; telephone call with G. Harper re multiple issues in case; review correspondence from G. Harper re C. Spangler analysis; correspondence with G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; conference call with C. Spangler re analysis of potential motion to dismiss arguments and motion for summary judgment argument
01/24/21	G. Harper	3.20	Review complaint and research re possible defenses; email with C. Spangler re same and motion to dismiss; review client documents
01/25/21	C. Dial	0.30	Call with G. Harper regarding next case steps
01/25/21	G. Harper	2.30	Call with team re case strategy and things to do; draft email to opposing counsel re extension of deadline to answer complaint; call with clients re same; email with C. Dial re motion to dismiss and schedule; review and respond to correspondence from C. Spangler re case strategy and possible motion to dismiss

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01/25/21	C. Spangler	3.00	Review and analyze complaint; analysis re potential motions to dismiss
01/25/21	S. Stodghill	0.90	Telephone call with G. Harper in preparation for [REDACTED] [REDACTED] review correspondence re extension for responsive pleadings in case; review multiple correspondence with C. Dial and C. Spangler re motion to dismiss and analysis of case
01/26/21	C. Dial	0.70	Calls with G. Harper, S. Stodghill, and client representatives regarding strategy for motion to dismiss
01/26/21	G. Harper	3.30	Multiple emails with CSpangler re litigation issues and grounds for motion to dismiss; call with team re things to do and strategy; multiple emails with Mrs. Wardell re case setup and strategy; review clients documents; [REDACTED] multiple emails with clients re case strategy; call with clients re same; call with SStodghill re things to do and strategy
01/26/21	C. Spangler	2.50	Analysis re potential motion to dismiss
01/26/21	S. Stodghill	2.60	Telephone call with G. Harper re analysis of complaint and potential motion to dismiss; review correspondence from G. Harper to K. Wardell re same; telephone call from G. Harper re scheduling of call with client and C. Spangler to discuss strategic defenses on motion to dismiss; review correspondence from G. Harper re same; review correspondence from L. Copeland re same; review correspondence from K. Wardell re same; conference call with clients, G. Harper and C. Spangler re analysis of case and potential motion to dismiss; review correspondence from G. Harper re same; telephone call with G. Harper re multiple legal research issues and document issues in case; correspondence with clients re same; correspondence with G. Harper re same; review correspondence from G. Harper re same

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01/27/21	G. Harper	0.90	Multiple communications with potential consulting expert re options and materials needed; call with team re same; review and respond to email from CSpangler re motion to dismiss issues; call with opposing counsel re issues for extension of answer deadline; draft and edit motion re same
01/27/21	C. Spangler	0.80	Prepare for call re analysis of complaint, potential motion to dismiss (.80)
01/27/21	S. Stodghill	1.20	Telephone call re motion to dismiss with C. Spangler; telephone call with C. Dial re same; further review of complaint in preparation for motion to dismiss; review correspondence from P. Burton; review correspondence from G. Harper re same; telephone call with G. Harper re [REDACTED]
01/28/21	C. Dial	0.20	Call with G. Harper and S. Stodghill regarding motion to dismiss strategy
01/28/21	M. Gaddis	1.00	Review complaint; attend team call to discuss motion to dismiss strategy and tasks
01/28/21	G. Harper	3.40	Multiple communications with group re client documents and review of same; multiple calls with SStodghill re strategy for dismissal; email with MGaddis re client documents and impact on motion to dismiss; email with team re motion to dismiss strategy and things to do for same; call to client re same; call with team re motion to dismiss, case strategy, and things to do
01/28/21	C. Spangler	0.80	Call with internal team re analysis of complaint, potential motion to dismiss (.50); communications re research re same (.30)
01/28/21	S. Stodghill	2.70	Review correspondence from G. Harper re task list related to document review, O'Connor discrimination opinion, motion to dismiss issues, extension to file responsive pleadings and scheduling of call; correspondence re same with G. Harper; review correspondence from C. Spangler re same; correspondence with C. Spangler re same;

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telephone call with G. Harper re motion to dismiss and other issues in case; review correspondence from C. Dial re scheduling of call; correspondence with WS team re motion to dismiss; review correspondence re same; correspondence re same; review correspondence from G. Harper to M. Gaddis re multiple issues in case; review correspondence from C. Dial re same; review correspondence from M. Gaddis re [REDACTED] review correspondence from C. Spangler re same; review correspondence from G. Harper re same; review correspondence from G. Harper re same; correspondence with K. Wardell re [REDACTED] [REDACTED] review correspondence from M. Gaddis re same; review correspondence from K. Wardell re issues in case; correspondence with K. Wardell re same; correspondence re [REDACTED] [REDACTED] conference call with WS team re motion to dismiss and related issues; review correspondence from C. Spangler re same

01/29/21	C. Dial	4.60	Research on Fifth Circuit case law [REDACTED] [REDACTED]
01/29/21	C. Dial	0.30	Scan application to practice in the Northern District of Texas and send to G. Harper for signature
01/29/21	G. Harper	2.60	Research re [REDACTED] [REDACTED] draft memo to team re same; email with team re strategy for dismissal motion; call with clients re same; multiple emails with team re documents cited in complaint; call with Mrs. Harper re [REDACTED] [REDACTED] multiple emails with opposing counsel re extension of answer deadline and possible stipulation for same
01/29/21	C. Spangler	0.80	Analysis and communications re research re motion to dismiss

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01/29/21	S. Stodghill	1.60	Review correspondence from C. Spangler re motion to dismiss under 5th Circuit law; review correspondence from G. Harper re issues related to same; review legal research memorandum from G. Harper re same; review correspondence re [REDACTED]; review materials re motion to dismiss
01/30/21	S. Stodghill	0.30	Review correspondence from P. Burton re [REDACTED] [REDACTED] correspondence with P. Burton re same
01/31/21	C. Dial	1.70	Research previous discrimination cases decided by Judge O'Connor

Total Hours 117.00**Sub-Total Legal Services****\$115,326.50****Less 10% Discount****(11,532.65)****Total for Legal Services****\$103,793.85****Timekeeper Summary**

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	30.70	1,245.00	38,221.50
C. Spangler	8.90	965.00	8,588.50
M. Gaddis	1.00	965.00	965.00
G. Harper	44.10	1,085.00	47,848.50
C. Dial	32.30	610.00	19,703.00
Total Attorney/Other Prof	117.00		115,326.50

Total Due This Invoice**\$104,578.20**

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Total Disbursements	0.00
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<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

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Total Disbursements	0.00
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Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
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WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2806724
 Invoice Date 06/21/21
 Client Matter No. 180333.00004

For Legal Services Rendered Through February 28, 2021 In Connection With:

00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
02/01/21	C. Dial	7.50	Research [REDACTED] and send summary to S. Stodghill, C. Spangler, and G. Harper
02/01/21	C. Dial	1.80	Summarize research on [REDACTED] and send to G. Harper, S. Stodghill, and C. Spangler
02/01/21	G. Harper	0.80	Review and respond to correspondence from opposing counsel re extension of answer deadline; draft and edit motion for extension
02/01/21	S. Stodghill	1.60	Telephone call with G. Harper re scheduling of call with [REDACTED] correspondence with K. Wardell re issues related to same; review materials re stipulation for extension of time to file response; review materials re [REDACTED] review correspondence re scheduling of call [REDACTED] review correspondence from [REDACTED]
02/02/21	C. Dial	1.10	Summarize research [REDACTED] and send to G. Harper, S. Stodghill, and C. Spangler
02/02/21	G. Harper	5.70	Email with opposing counsel re motion for extension of deadline to answer; call with SStodghill re [REDACTED]; draft and edit motion for extension of answer deadline; research re same; review correspondence with

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Date	Attorney/Other Prof	Hours	Description
			opposing counsel re call with clerk; call with Mrs. Synhorst re [REDACTED] research re extensions under Fed. R. Civ. P. (6)(b); revise motion re same; multiple calls with S. Stodghill re same; call with clients re same; draft order on motion; multiple calls and emails with opposing counsel re motion and changes to same; arrange for filing of same; multiple calls with client re [REDACTED]; review order on extension of time for answer; call with S. Stodghill re same; call with SStodghill re motion to dismiss issues; email with CSpangler re motion to dismiss and strategy for same
02/02/21	C. Spangler	1.70	Analysis and communications re motion to dismiss research
02/02/21	S. Stodghill	2.50	Telephone call with G. Harper re preparation for conference call [REDACTED] and related preparation of materials; review correspondence from C. Spangler re [REDACTED] review correspondence from C. Spangler to C. Dial re [REDACTED] research; review correspondence from C. Dial re legal research issues [REDACTED] correspondence with C. Dial re same; review correspondence from C. Spangler re same; review legal research memorandum from C. Dial re [REDACTED]; correspondence with C. Dial re same; review correspondence from P. Burton re scheduling of calls; correspondence with P. Burton re same; review legal research memorandum from C. Dial re [REDACTED] review correspondence and materials from G. Harper re motion for extension to file responsive pleadings; further drafting of [REDACTED] review correspondence re [REDACTED] meeting; correspondence re same; review correspondence from L. Copeland re scheduling of call [REDACTED] review correspondence from N. McAfee re same; review correspondence from [REDACTED] review

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Date	Attorney/Other Prof	Hours	Description
			multiple correspondence re scheduling of call; review correspondence from L. Copeland re same; review related correspondence; review correspondence from K. Wardell re same
02/03/21	C. Dial	0.70	Update task list and judge requirements to send to G. Harper
02/03/21	G. Harper	1.10	Review court order re scheduling conference; email with clients and team re same and things to do; call with SStoghill re issues [REDACTED] [REDACTED] draft email to experts re [REDACTED] [REDACTED] multiple emails with SStodghill re issues for scheduling conference and strategy for same; call with team re motion to dismiss and strategy for same
02/03/21	K. Marcom	0.40	Confer with G. Harper re Motion to Dismiss
02/03/21	S. Stodghill	2.90	Review correspondence from G. Harper to client re Judge O'Connor scheduling order and related issues; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call with G. Harper re same and extension for filing of responsive pleadings; correspondence with G. Harper and clients re discovery issues and trial setting; review draft [REDACTED]; review correspondence from G. Harper re same; telephone call to G. Harper re revisions to same; review correspondence from G. Harper to WS team re scheduling order and task list; review correspondence from C. Spangler re issues in case; review correspondence from G. Harper re motion to extend; review notice from the Court, order and related correspondence; review correspondence from C. Dial re [REDACTED] review correspondence from C. Spangler re same; review correspondence from G. Harper re issues in case; review correspondence from C. Spangler re legal research issues; review correspondence and legal research from C. Dial re same; review

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Date	Attorney/Other Prof	Hours	Description
			correspondence from K. Holtz re [REDACTED] correspondence with G. Harper re [REDACTED] telephone call with G. Harper re responsive pleadings; review correspondence from G. Harper re scheduling order; review correspondence from G. Harper re scheduling of [REDACTED] review correspondence from P. Burton re scheduling of call; review correspondence from L. Copeland re same; review correspondence from N. McAfee re same; review correspondence from J. Gallagher re scheduling order; review correspondence from [REDACTED] [REDACTED] review correspondence from P. Burton re same; review correspondence re call [REDACTED]
02/03/21	S. Stodghill	0.20	Telephone call with G. Harper re [REDACTED]
02/04/21	C. Dial	0.10	Update task list and send judge requirements to send to G. Harper, C. Spangler, and S. Stodghill
02/04/21	G. Harper	1.60	Call and email with CSpangler re motion to dismiss; review correspondence re magistrate judge issues; research re same; email with clients re same and issues for scheduling conference
02/04/21	C. Spangler	3.00	Analysis and communications with G. Harper re motion to dismiss briefing
02/04/21	S. Stodghill	2.80	Review correspondence from L. Copeland re scheduling of call with [REDACTED] review correspondence from K. Holtz re [REDACTED] case; review correspondence from T. Vang re same; review correspondence from K. Holtz re same; review correspondence from K. Wardell re interviews of persons with knowledge of case and initial disclosures; correspondence with K. Wardell re same; review correspondence from G. Harper to K. Wardell re trial before a magistrate; review correspondence from G. Harper to K. Wardell re Judge Cureton; telephone call with G. Harper re motion to dismiss; telephone call with K. Marcom re motion to dismiss; review correspondence from

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Date	Attorney/Other Prof	Hours	Description
			<div style="background-color: black; height: 1.2em; width: 100%;"></div> correspondence with WS team re section of brief and related legal research; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call with G. Harper re same; review correspondence from K. Wardell re issues in case; review correspondence from K. Wardell re Magistrate H. Ray, Jr.; review correspondence from G. Harper re motion to dismiss; correspondence with G. Harper re same; multiple correspondence with G. Harper re same; review correspondence from G. Harper re motion to dismiss; correspondence re same; review revised task list and related correspondence from C. Dial; telephone call with G. Harper re motion to dismiss research
02/05/21	C. Dial	0.70	Call with K. Marcom regarding outlining portions of motion to dismiss; send K. Marcom previous notes and case documents
02/05/21	K. Marcom	0.70	Confer with C. Dial re Motion to Dismiss; analyze Complaint
02/05/21	S. Stodghill	1.40	Telephone call with G. Harper re legal issues in motion to dismiss; review correspondence from order for joint report; correspondence with G. Harper re same; telephone call to G. Harper re same; review correspondence re deadline to confer; review correspondence re defendants answer date; review legal research re issues for motion to dismiss
02/08/21	C. Dial	1.10	Outline elements and relevant allegations for <div style="background-color: black; height: 1.2em; width: 100%;"></div> claims

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02/08/21	S. Stodghill	2.30	Telephone call with G. Harper re deadlines and revisions to materials in preparation for [REDACTED] [REDACTED] call; review and revision to same; review materials and legal research related to motion to dismiss; telephone call to K. Marcom re same; telephone call with G. Harper re multiple issues related to motion to dismiss; review materials re [REDACTED]
02/09/21	C. Dial	3.80	Research for outline of [REDACTED] possible arguments for motion to dismiss
02/09/21	M. Gaddis	1.10	Review complaint; call G. Harper to discuss motion to dismiss
02/09/21	G. Harper	2.00	Call with MGaddis re motion to dismiss and strategy for same; call with KMarcom re same; call and email with SStodghill re issues with motion to dismiss; review client documents re factual issues in dispute; multiple emails with team re document database and additional materials needed from client; review and revise [REDACTED] [REDACTED]
02/09/21	K. Marcom	1.00	Analyze Complaint re Motion to Dismiss arguments
02/09/21	S. Stodghill	1.30	Telephone call with G. Harper re [REDACTED] [REDACTED] preparation for conference call [REDACTED] [REDACTED] review materials re motion to dismiss; telephone call with K. Marcom re issues related to motion to dismiss; review materials re same
02/10/21	C. Dial	0.20	Schedule swearing-in ceremony for the Northern District of Texas and send ECF application form to Clerk's Office
02/10/21	C. Dial	1.00	Send previous research, notes, and reviewed case law to M. Gaddis for review; review additional case law regarding [REDACTED] [REDACTED]

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02/10/21	C. Dial	0.20	Correspondence with K. Marcom regarding additional research and potential arguments in the complaint
02/10/21	C. Dial	4.90	Analyze case law and statutes regarding [REDACTED] outline elements of claim, possible arguments, and relevant allegations in the complaint and send to K. Marcom.
02/10/21	M. Gaddis	4.20	Review complaint; research and review case law [REDACTED]; work on potential issues for motion to dismiss; communicate with C. Dial re same
02/10/21	G. Harper	4.60	Draft and edit correspondence with Ms. Gray re various issues and plan for scheduling conference; draft and edit letter [REDACTED] multiple calls with S. Stodghill re case issues and [REDACTED] call with [REDACTED] and clients re engagement issues; draft memo to team re [REDACTED]; multiple emails with opposing counsel re trial date issues and concerns about scheduling conference; revise engagement letter [REDACTED] review and respond to correspondence re list of persons with knowledge; review witness summaries [REDACTED] call with clients re same
02/10/21	K. Marcom	1.90	Analyze Complaint for Motion to Dismiss drafting
02/10/21	S. Stodghill	2.20	Review and revision to draft letter to P. Burton of [REDACTED] review correspondence with G. Harper re same; revision to same; telephone call to G. Harper re same; correspondence with G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call with G Harper re final filings of documents; review recent correspondence; review correspondence re call [REDACTED] review correspondence from P. Burton re same; telephone call with Cook team, [REDACTED] and G. Harper re

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issues in presentation; telephone call with G. Harper re same; review draft letter re [REDACTED]
 [REDACTED] review correspondence from G. Harper re same; review correspondence from J. Gallagher re same; review correspondence from K. Wardell re same

02/10/21	S. Stodghill	0.40	Telephone call with G Harper re preparation for call [REDACTED]
02/11/21	C. Dial	0.30	Correspondence with G. Harper regarding admittance status, client document access, and attorney conference scheduling
02/11/21	M. Gaddis	4.50	Work on motion to dismiss; research and review case law for same
02/11/21	G. Harper	2.30	Review client documents; email with team re same; call with MGaddis re issues for motion to dismiss; draft fact section for motion; review client documents re same
02/11/21	K. Marcom	2.00	Research and analyze Complaint for Motion to Dismiss arguments
02/11/21	S. Stodghill	1.40	Review correspondence from P. Burton re edits to letter; review draft letter; review related correspondence; correspondence with G. Harper re same; review correspondence from P. Burton; telephone call to G. Harper in preparation for call [REDACTED] review correspondence from P. Burton re scheduling of call; review related correspondence; review correspondence from P. Burton re same; review multiple correspondence with P. Burton re [REDACTED] [REDACTED]
02/12/21	C. Dial	0.40	Take oath to practice in the Northern District of Texas
02/12/21	C. Dial	1.10	Attend attorney conference as required by Rule 26f; send notes of conference to G. Harper and C. Spangler

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02/12/21	C. Dial	2.90	Research and analyze Fifth Circuit case law regarding [REDACTED]
02/12/21	M. Gaddis	6.70	Multitple calls with G. Harper, C. Spangler, C. Dial, and K. Marcom to discuss motion to dismiss and various research issues for same; work on same; review complaint and compile timeline of events; analyze [REDACTED]
02/12/21	G. Harper	3.00	Email with SStodghill re expert issues; review revised engagement letter [REDACTED] call with C. Spangler re trial issues; prepare for and attend Rule 26 conference; call with C. Spangler re same; call with S. Stodghill re same; call with clients re same; call with [REDACTED]
02/12/21	K. Marcom	0.90	Work on Motion to Dismiss brief
02/12/21	C. Spangler	2.60	Conferences with opposing counsel, G. Harper re 26(f) report (1.30); strategize re motion to dismiss and communications with M. Gaddis re same (1.30)
02/12/21	S. Stodghill	2.60	Telephone call with G. Harper in preparation for call with plaintiff's counsel re scheduling order and in preparation for call [REDACTED] review draft materials related to [REDACTED] [REDACTED] review multiple correspondence from P. Burton re scheduling of call; conference call re multiple issues with [REDACTED] telephone call with G. Harper re same; review correspondence from [REDACTED] telephone call with G. Harper re [REDACTED] [REDACTED] telephone call with G. Harper re motion to dismiss; review materials re motion to dismiss
02/13/21	M. Gaddis	4.30	Research and review case law on issues for motion to dismiss; work on same; review client documents
02/13/21	K. Marcom	10.40	Draft Motion to Dismiss on 1981 and disability-related claims

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02/14/21	K. Marcom	2.10	Draft Motion to Dismiss on 1981 and disability-related claims
02/14/21	S. Stodghill	3.10	Further review of materials and draft of motion to dismiss; review correspondence re same; review legal research re same; correspondence re same; multiple telephone calls re same
02/15/21	C. Dial	2.40	Research [REDACTED] [REDACTED] and send findings to M. Gaddis
02/15/21	M. Gaddis	3.80	Review and revise draft motion to dismiss; communicate with team re same
02/15/21	G. Harper	0.90	Call with CSpangler re motion to dismiss; call and email with Mrs. Wardell re various issues with litigation; call with MGaddis re motion to dismiss; review draft of same
02/15/21	C. Spangler	1.70	Review 5th Circuit case law re motion to dismiss
02/15/21	S. Stodghill	2.70	Telephone call with G. Harper re motion to dismiss; review correspondence from G. Harper re same; correspondence with G. Harper re M. Gaddis section of brief; telephone call to M. Gaddis re same; correspondence with M. Gaddis, C. Spangler, G. Harper and K. Marcom re same; review correspondence from K. Marcom re [REDACTED] [REDACTED] and motion to dismiss; review and revision to same; correspondence with K. Marcom re same; correspondence with M. Gaddis re section of motion to dismiss; review correspondence from G. Harper re M. Gaddis section of motion to dismiss; correspondence with G. Harper re M. Gaddis section of motion to dismiss; telephone call with G. Harper re revision to motion to dismiss; review multiple correspondence re revision to brief; review correspondence from M. Gaddis re brief section; correspondence with M. Gaddis re same; telephone call with G. Harper re revision to brief

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02/16/21	G. Harper	2.20	Call with team re motion to dismiss; draft and edit same; review edits to [REDACTED] email and call with SStodghill re same; multiple emails and calls with client re same
02/16/21	C. Spangler	3.20	Review and revise draft motion to dismiss
02/16/21	S. Stodghill	2.60	Further review and revision to motion to dismiss; review legal research re same; review multiple correspondence re same; telephone call to G. Harper re same; review correspondence from P. Burton re [REDACTED] correspondence with P. Burton re same; correspondence with G. Harper re same; review correspondence from G. Harper re [REDACTED] correspondence with G. Harper re same; review correspondence from G. Harper to K. Wardell re [REDACTED] [REDACTED] review correspondence from G. Harper to C. Spangler re draft of motion to dismiss; review correspondence from C. Spangler re same; correspondence with C. Spangler re same; review correspondence from C. Spangler re revision to motion to dismiss; telephone call with G. Harper re brief
02/17/21	C. Dial	4.70	Research [REDACTED] motion to dismiss standard and pleading requirements for motion to dismiss; draft edits for motion to dismiss and send to K. Marcom
02/17/21	C. Dial	1.30	Call regarding motion to dismiss with G. Harper, M. Gaddis, S. Stodghill, and C. Spangler; call regarding motion to dismiss edits with K. Marcom
02/17/21	M. Gaddis	1.40	Review draft motion to dismiss; attend team call to discuss revisions to same

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02/17/21	G. Harper	2.70	Call with team re motion to dismiss briefing and work on same; multiple emails with CSpangler and team re same and things to do; email with opposing counsel re scheduling conference and weather issues; call with SStodghill re motion to dismiss and issues with same; multiple calls with KMarcom re dismissal brief; email with clients re same
02/17/21	K. Marcom	3.50	Revise Motion to Dismiss
02/17/21	C. Spangler	1.80	Review draft motion to dismiss; conference re revisions to same
02/17/21	S. Stodghill	2.60	Review correspondence from C. Spangler re scheduling of call re motion to dismiss; correspondence with C. Spangler re same; review correspondence from M. Gaddis re same; review correspondence from C. Spangler re same; review correspondence from C. Spangler re same; conference call with C. Spangler, C. Dial, M. Gaddis and G. Harper re revisions and additions to same; review revised motion to dismiss and related issues; review correspondence from G. Harper re multiple issues related to motion to dismiss; review correspondence from C. Spangler re comments to motion to dismiss; telephone call with G. harper re same; review revised motion to dismiss and related materials; review correspondence from G. Harper re same
02/18/21	M. Gaddis	2.70	Review and revise draft motion to dismiss; call C. Spangler to discuss same; communicate with team re same
02/18/21	G. Harper	3.70	Draft and edit motion to dismiss; research re same; call with team re motion to dismiss; call with KMarcom re [REDACTED]; email with client re same
02/18/21	K. Marcom	4.60	Work on Motion to Dismiss

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02/18/21	C. Spangler	2.50	Review and revise draft motion to dismiss; communications re same
02/18/21	S. Stodghill	3.50	Review correspondence from C. Spangler re revisions and additions to motion to dismiss; review correspondence from G. Harper re additions and revisions to motion to dismiss; correspondence with G. Harper re revision to same; correspondence with C. Spangler and G. Harper re draft motion to dismiss; review correspondence from C. Spangler re additional comments to brief; correspondence with C. Spangler and G. Harper re same; correspondence with G. Harper re same; telephone call with G. Harper re multiple issues and revisions to brief; review correspondence from K. Marcom re issues related to motion to dismiss; review correspondence from C. Spangler re revisions to brief; review revised motion to dismiss plaintiff's original complaint and brief in support; review correspondence from G. Harper re same; correspondence with G. Harper and C. Spangler re motion to dismiss issues; review correspondence from P. Burton re [REDACTED] correspondence with P. Burton re same; review revised draft brief and correspondence from G. Harper to clients re comments to same; review correspondence from G. Harper re same; correspondence with K. Marcom re same; telephone call with G. Harper re revision to brief; review correspondence from K. Marcom re revision to same; review correspondence re revision to same from G. Harper; review correspondence and redline revisions to motion to dismiss; review correspondence from J. Gallagher re revisions to motion to dismiss
02/19/21	C. Dial	0.70	Review corporate disclosure statement and format for filing documents attached to motion; consult with K. Marcom

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02/19/21	C. Dial	1.80	Draft motion for C. Spangler to appear pro hac vice; correspondence with C. Spangler and S. Hinton regarding admission information
02/19/21	C. Dial	0.20	Review final draft of motion to dismiss
02/19/21	M. Gaddis	0.80	Review and revise draft motion to dismiss; review filing requirements; communicate with team re same
02/19/21	G. Harper	7.60	Multiple emails with team re things to do; email with KMarcom re pro hac vice motion for CSpangler; review revised motion to dismiss and edit same; call with team re motion to dismiss; draft and edit same; review and edit corporate disclosure statement; research local rules re same; call with team re revisions needed for compliance; multiple emails re notice of appearance and revisions to same; review rules for Judge O'Connor; multiple emails with team re need for compliance with same; multiple emails with opposing counsel re additional scheduling conference; draft proposed order on motion to dismiss; call with CSpangler re dismissal motion and strategy for scheduling order; multiple calls and emails with clients re [REDACTED] [REDACTED] revise brief; multiple emails with clients re same and issues in brief; email with team re same; research re same; call with KMarcom re motion to dismiss and things to do; multiple emails with MGaddis and KMarcom re required appendix and contents of same
02/19/21	K. Marcom	3.50	Work on Motion to Dismiss and associated filings; finalize materials for filing
02/19/21	C. Spangler	3.00	Review and revise motion to dismiss; communications re same; communications re pro hac vice motion, continued 26(f) conference
02/19/21	S. Stodghill	4.20	Review correspondence re revision and filing of motion to dismiss; review revised motion to dismiss; review correspondence from G. harper re

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same; review correspondence from g. Harper re additional revisions to motion to dismiss; review correspondence from C. Dial re revisions to motion to dismiss; review correspondence from C. Spangler re revisions to motion to dismiss; review correspondence from C. Spangler re revisions to motion to dismiss; review revisions to motion to dismiss; telephone call to G. Harper re same; review draft proposed order on motion to dismiss; review correspondence from C. Spangler re same; review correspondence from G. Harper re Judge O'Connor local rules on filing of motion to dismiss; review correspondence from G. harper to C. Dial and K. Marcom re local rule 3.1(3); review defendants' corporate disclosure statement; review correspondence re same; review correspondence from G. harper re motion for admission pro hac vice of C. Spangler; review correspondence from M. Gaddis re additional revisions to motion to dismiss; review redline of motion to dismiss; review correspondence from C. Spangler re additional revisions to brief; review correspondence from K. Marcom re additional issues related to motion to dismiss; correspondence re same; review correspondence and comments to motion to dismiss from L. Copeland; review revised motion to dismiss from G. harper; review correspondence from G. Harper to C. Spangler re revision to motion to dismiss; review correspondence from C. Spangler re revisions to motion to dismiss; review correspondence re filing and service of motion to dismiss; review correspondence from K. Marcom re final draft of motion to dismiss

02/20/21 S. Stodghill

2.10 Review correspondence, order and binder for motion to dismiss; review correspondence from M. Gaddis re same; correspondence with WS team re motion to dismiss issues; review correspondence re filing and service of motion to dismiss with Judge O'Connor's chambers; review correspondence with the Court re filing and service of motion to dismiss and additional materials; review notice from the Court, certificate of

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interested persons/disclosure statement and related correspondence; review notice from the Court, motion to dismiss for failure to state a claim and related correspondence; review notice from the Court, notice of attorney appearance and related correspondence; review correspondence from G. Harper to K. Marcom re final revisions to motion to dismiss; review correspondence from C. Spangler re same; review correspondence and materials related to unpublished cases stated in brief; review correspondence and response by C. Spangler; review correspondence from C. Spangler; review correspondence from G. Harper re same

02/22/21	C. Dial	0.50	Correspondence with G. Harper and C. Spangler regarding client questions and outstanding issues for attorney conference
02/22/21	C. Dial	0.30	Second attorney conference regarding contents of joint 26f report to be submitted to the court
02/22/21	C. Dial	2.70	Draft joint 26f report and send draft to G. Harper
02/22/21	G. Harper	3.50	Call with C. Spangler re Rule 26 conference; prepare for same; call with clients re dates for conference; attend scheduling conference; multiple emails with opposing counsel re protective order; draft and edit same; call with CDial re status and things to do; review client documents re initial disclosures and items to address in Rule 26(f) report; multiple calls with team and clients re same and things to do
02/22/21	C. Spangler	1.40	Prepare for and participate in continued 26(f) conference
02/22/21	S. Stodghill	1.20	Telephone call with G. Harper re follow up issues to motion to dismiss and [REDACTED] telephone call re [REDACTED] preparation for 26(f) conference with opposing counsel; review materials re initial disclosures of fact witnesses; telephone call to K. Marcom re task list in case; telephone call with K.

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Marcom re same; correspondence with k. Marcom
re same; review correspondence from K. Marcom
re same

02/23/21	C. Dial	0.10	Review proposed protective order to be filed with the court
02/23/21	G. Harper	4.80	Draft and edit proposed protective order; multiple emails with team re same; research re same and orders from Judge O'Connor; review and respond to emails from opposing counsel re proposed edits to protective order; call with CSpangler re same; call with clients re same; prepare for and attend further Rule 26 conference; revised protective order; draft and edit rule 26 report
02/23/21	S. Stodghill	1.60	Review correspondence in case; correspondence with G. Harper re same; telephone call to G. Harper re [REDACTED] [REDACTED] review and revise draft protective order; review correspondence from G. Harper re same; review correspondence from L. Copeland re same; review correspondence from G. Harper re agreed protective order; telephone call with G. Harper re issues related to scheduling order and potential stipulation; correspondence with K. Wardell and L. Copeland re issues in case; review correspondence from J. Gallagher re same; review correspondence from G. Harper re [REDACTED] [REDACTED] correspondence with G. Harper re same; review correspondence from K. Wardell
02/24/21	C. Dial	0.40	Review draft joint report; send edits to G. Harper and C. Spangler
02/24/21	G. Harper	5.40	Draft and edit 26(f) proposal; research re same; call with CSpangler re same; call with clients re same; review correspondence from client re [REDACTED] [REDACTED] call with CSpangler re same; call with CDial re revisions to 25f proposal; call with clients re [REDACTED] [REDACTED] multiple calls with [REDACTED] re [REDACTED]

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			██████████ and strategy for dealing with same; call with SStodghil and clients re same
02/24/21	C. Spangler	0.80	Conference and communications with G. Harper, C. Dial re 26(f) report, protective order
02/24/21	S. Stodghill	1.70	Review and revision to draft scheduling order; review correspondence from G. Harper re same; telephone call with G. Harper re same; review revisions to draft 26f joint report from C. Spangler; review correspondence from G. Harper re same; telephone call from G. Harper re rule 26f joint report and ██████████ review correspondence from C. Spangler re same; review correspondence from C. Dial re revision to rule 26f report; review correspondence from G. Harper re response to same; telephone call with G. Harper re Dr. Thomas claim for unemployment
02/25/21	C. Dial	0.30	Review proposed joint report from Mr. Thomas; correspondence with S. Hinton regarding C. Spangler pro hac vice motion; edit C. Spangler pro hac vice motion
02/25/21	G. Harper	3.90	Revise 26f report; correspond with opposing counsel re same; review proposed edits to report by opposing counsel; correspond with CSpangler re same; multiple calls and emails with client re Plaintiff's workforce commission filing and impact on litigation; multiple calls with ██████████ re same and response; call with SStodghill re same and strategy for dealing with same; call with CSpangler re same
02/25/21	C. Spangler	0.30	Analysis and communications re joint report
02/25/21	S. Stodghill	1.60	Review correspondence from G. Harper re issues in case; correspondence re same; review revised draft of rule 26f report; review correspondence from G. Harper re same; review correspondence from S. Gray re same; review additional changes to rule 26f report; review correspondence from C. Spangler re same; review correspondence from G. Harper re same; review correspondence from S.

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Gray re revision to rule 26f pleading; review correspondence from S. Gray re same; review correspondence re revision to rule 26f report to C. Spangler; review correspondence from G. Harper re same; review correspondence from S. Gray; review revised rule 26f report and related correspondence from G. Harper

02/26/21 C. Spangler 0.80 Analysis and communications re protective order, joint status report

Total Hours 230.80

Sub-Total Legal Services \$222,392.00
Less 10% Discount (22,239.20)
Total for Legal Services \$200,152.80

Timekeeper Summary

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	48.50	1,245.00	60,382.50
C. Spangler	22.80	965.00	22,002.00
M. Gaddis	29.50	965.00	28,467.50
G. Harper	55.80	1,085.00	60,543.00
C. Dial	43.20	610.00	26,352.00
K. Marcom	31.00	795.00	24,645.00
Total Attorney/Other Prof	230.80		222,392.00

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Disbursements & Other Charges**Description****Amount**

Air Courier

9.66

Total Disbursements & Other Charges**\$9.66****Total Due This Invoice****\$200,162.46**

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2806724
 Invoice Date 06/21/21
 Client Matter No. 180333.00004

Client Remittance Copy

Total Fees	\$200,152.80
Total Disbursements	9.66
Total Due This Invoice	\$200,162.46

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2806724
 Invoice Date 06/21/21
 Client Matter No. 180333.00004

Remittance Advice

Please include this remittance page with your payment

Total Fees	\$200,152.80
Total Disbursements	9.66
Total Due This Invoice	\$200,162.46

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
Via Mail: Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	Via Delivery Service: Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2811823
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

Revised Invoice

Original Invoice: 2807351

For Legal Services Rendered Through March 31, 2021 In Connection With:

00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
03/01/21	G. Harper	3.30	Draft and edit Rule 26 report; multiple calls with opposing counsel re same;; draft and edit protective order; research re same; multiple calls with clients and team re same;; research re [REDACTED]; research re [REDACTED]; research re [REDACTED]. call with opposing counsel re issues with protective order and changes to same
03/01/21	S. Stodghill	1.70	Telephone call to G. Harper re rule 26(f) report and protective order; review multiple correspondence and materials re same; correspondence with G. Harper re [REDACTED]; telephone call with G. Harper re same; telephone call with G. Harper re rule 26(f) report and protective order; review correspondence and materials re same; review revised draft rule 26(f) joint report and related correspondence from G. Harper to opposing counsel; review correspondence from S. Gray re same; review correspondence from G. Harper to S. Gray re redline of same; review correspondence from S. Gray re response to rule 26(f) joint report; review correspondence from G. Harper re rule 26(f) joint report
03/02/21	G. Harper	5.80	Edit Joint Scheduling Report; multiple calls and emails with opposing counsel re same; multiple calls and emails with clients re same; email with CSpangler re same; email with SStodghill re same;

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Date	Attorney/Other Prof	Hours	Description
			review and edit proposed protective order; multiple calls and emails with opposing counsel re same; multiple calls with client re TWC claim; call with Greg Harper re same and strategy; email and call with opposing counsel re TWC claim; finalize and file 26(f) report and proposed protective order; draft response to TWC re complaint; multiple calls and emails with client re same; email and call with CSpangler re same
03/02/21	S. Stodghill	2.60	Review correspondence from G. Harper to S. Gray re scheduling of call related to rule 26(f) joint report and Thomas unemployment benefit filing; review correspondence in case; telephone call with G. Harper re preparation for conference call; correspondence with G. Harper re same; review correspondence from S. Gray re scheduling of call; review correspondence from S. Gray re protective order issues; review correspondence from G. Harper re same; telephone call with G. Harper re protective order dispute; review correspondence from S. Gray re same; review correspondence from K. Wardell re revisions to rule 26(f) joint report; review revised protective order and related correspondence to S. Gray from G. Harper; review correspondence from G. Harper to clients re same; review correspondence from G. Harper to clients re rule 26(f) document; review correspondence from L. Copeland re same; review correspondence from J. Gallagher re same; telephone call with G. harper re response to unemployment filing by Thomas; review correspondence from S. Gray re conference call on protective order; review correspondence from S. Gray re unemployment application; correspondence with G. Harper re same; review correspondence from G. Harper re same; review revised protective order and related correspondence
03/03/21	C. Dial	3.40	Draft initial disclosures and send draft to G. Harper; correspondence with S. Stodghill and G. Harper regarding medical privileges research and

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Date	Attorney/Other Prof	Hours	Description
			initial disclosures; call with G. Harper regarding necessary research and initial disclosures; draft summary of needed research to send to S. Stodghill
03/03/21	G. Harper	5.90	[REDACTED]; revise and edit response to TWC re complaint; multiple calls and emails with client re same; email and call with SStodghill re same; call with SStodghill re peer review privilege issues; call and email CDial re same; call with SStodghill re response to TWC complaint; correspond with CSpangler re same and strategy; multiple emails with client re same; revise same; review scheduling order; call with client re same; call with client re same; multiple emails with opposing counsel re discovery issues; multiple emails and calls with team re peer review privilege issues; call with AJeriege re same and research needed; finalize and file TWC response; review initial disclosures
03/03/21	A. Jereige	3.90	Conduct legal research re [REDACTED] and draft memo re same
03/03/21	S. Stodghill	3.30	Review notice from the court and related correspondence; review recent filings and correspondence in case; review correspondence re protective order; review correspondence to S. Gray re attachment to rule 26(f) report; telephone call with G. Harper re legal research related to privilege issues; review correspondence from G. Harper to C. Dial re same; correspondence with C. Dial and G. Harper re same; review draft response to Texas Workforce Commission submission; review correspondence from G. Harper re same; review correspondence from G. Harper to client re same; review and revision to response to Texas Workforce Commission and related correspondence; correspondence with G. Harper and client re revision to same; review correspondence from C. Dial re legal research into

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Date	Attorney/Other Prof	Hours	Description
			privilege and initial disclosures; correspondence with C. Dial re initial disclosures and legal research issues; review correspondence from G. Harper re same; review correspondence from G. Harper to C. Dial re initial disclosures; correspondence re privilege legal research; review research memorandum from C. Dial; review scheduling order; review correspondence from G. Harper re same; review correspondence from J. Gallagher re same; review correspondence related to scheduling order; review correspondence from G. Harper re expert deadlines; review correspondence re initial disclosures from G. Harper; review correspondence re scheduling order; review correspondence from G. Harper to clients re same; review notice from the Court and related correspondence; review revisions to Texas Workforce Commission and related correspondence from K. Wardell; correspondence with A. Jereige re legal research into privilege; correspondence with C. Dial, A. Jereige and G. Harper re same; review correspondence from G. Harper re same; review correspondence from C. Dial re same
03/04/21	C. Dial	1.50	Review and tag client documents in Relativity
03/04/21	G. Harper	3.00	Attention to client documents and review of same; multiple emails and calls with MSchneider re same
03/04/21	A. Jereige	3.60	Assist in Thomas v. Cook Children's Hospital matter re drafting privilege law memo
03/04/21	S. Stodghill	1.90	Review correspondence from A. Jereige re privilege legal research issues; review correspondence from G. Harper re same; review correspondence from G. Harper re same; further review of scheduling order; review correspondence from G. Harper re expert disclosures and retainer; review correspondence from G. Harper re retention of experts; review correspondence from L. Copeland re same; review correspondence from G.

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Date	Attorney/Other Prof	Hours	Description
			Harper to A. Jereige re privilege research; review correspondence from A. Jereige re same; review Texas Workforce Commission filed response and related correspondence; review correspondence from S. Gray re expert response and complaints; conference call with K. Marcom and G. Harper re discovery and document issues; review correspondence re same; review correspondence from G. Harper to K. Wardell re multiple issues in case; review correspondence from K. Wardell re same
03/05/21	C. Dial	3.20	Summarize the persons with knowledge listed in Mr. Thomas's initial disclosures; review and edit initial disclosures; review and tag client documents in Relativity
03/05/21	G. Harper	5.50	Multiple calls with opposing counsel re proposed stipulation on event reports; call with team re same; draft and edit proposed stipulation; draft and edit initial disclosures; multiple calls and emails with team re same; call with clients re same and people with knowledge; [REDACTED] [REDACTED]; correspond with opposing counsel re disclosure issues; edit, finalize, and serve same; edit stipulation re event disclosures; call and email with opposing counsel re same; review revised stipulation from opposing counsel; research accuracy of same; call with client re same; call with team re same; correspond with MSchneider re client document issues; review Plaintiff's initial disclosures; call with CDial re same; call with clients re same; call with CSpangler re same and things to do
03/05/21	A. Jereige	2.60	Assist in Thomas v. Cook Children's Hospital matter re drafting privilege law memo
03/05/21	C. Spangler	0.50	Communications re written discovery requests
03/05/21	S. Stodghill	2.70	Telephone call with G. Harper re initial disclosures

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Date	Attorney/Other Prof	Hours	Description
			and related issues; review draft Cook Children's initial disclosures and related issues from C. Dial; review correspondence from G. Harper re revision to same; correspondence re revisions to same; review correspondence from S. Gray re potential stipulation; review correspondence from G. Harper to S. Gray re same; review correspondence from C. Spangler to G. Harper re revision to initial disclosures; review plaintiff's initial disclosures; review correspondence from S. Gray re same; [REDACTED]; review correspondence from G. Harper re same; review correspondence from K. Wardell re stipulation; review correspondence from G. Harper re stipulation; review correspondence from S. Gray re initial disclosures; review correspondence from G. Harper re stipulation; review correspondence from S. Gray re same; review correspondence from G. Harper to S. Gray re same; review correspondence from L. Copeland re same; review correspondence from G. Harper re service of initial disclosures; review correspondence from G. Harper to S. Gray re same; review multiple correspondence with S. Gray re same; review correspondence from S. Gray re same; review multiple correspondence re stipulation language
03/06/21	S. Stodghill	0.20	Review correspondence from C. Dial re plaintiff's expert resumes; correspondence with C. Dial re same
03/07/21	C. Dial	0.40	Research background information on potential witnesses identified by Mr. Thomas
03/08/21	C. Dial	0.40	Summarize Dr. Gary's bio information to send to S. Stodghill, G. Harper, and C. Spangler
03/08/21	G. Harper	4.80	Review memo re research on peer review privilege; call with CSpangler re same; revise and edit materials to Chubb; call with clients re same; call with CSpangler re strategy and things to do;

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Date	Attorney/Other Prof	Hours	Description
			research and review client documents re claims; forward relevant documents to team with correspondence on same; multiple communications with CDial and team re document review issues
03/08/21	C. Spangler	0.20	Communications re discovery requests
03/08/21	S. Stodghill	1.40	Review summary of Dr. B. Gary biography and related correspondence from C. Dial; correspondence with C. Dial re same; telephone call from G. Harper re issues in case; review biography of K. King MD and related correspondence from C. Dial; review correspondence and biography of A. Hayes; correspondence with G. Harper and C. Spangler re plaintiff expert disclosures; review correspondence from S. Gray re stipulation; review correspondence from G. Harper re same
03/09/21	C. Dial	0.70	Correspondence with S. McMillen regarding finishing process for admittance to practice in the Northern District of Texas; correspondence with G. Harper and M. Schneider regarding tagging documents for review
03/09/21	G. Harper	1.80	Review client documents re claims and additional materials that need to be gathered; email with CSpangler re litigation claims and complaints against Plaintiff; review proposed stipulation; email to opposing counsel re same; email to clients re same; call with SStodghill re discovery; review and respond to correspondence from CSpangler re same; review discovery; call with CDial re document review issues
03/09/21	S. Lemajeur	6.80	Review case materials; discuss case matters with C. Spangler; draft Defendants' First Set of Interrogatories to Plaintiff
03/09/21	C. Spangler	0.50	Communications with S. Lemajeur re case materials, discovery requests

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Date	Attorney/Other Prof	Hours	Description
03/09/21	S. Stodghill	2.10	Review correspondence from G. Harper re issues related to discovery; review correspondence re same; review related correspondence; review correspondence from S. Cohen re same; review correspondence from S. D'Amore re same; review correspondence from G. Harper re same; review correspondence from C. Spangler re defendants discovery requests; review correspondence from G. Harper to C. Spangler re same; multiple calls with G. Harper re discovery requests, stipulation, [REDACTED] expert designations, and response to motion to dismiss; telephone call re [REDACTED]; [REDACTED]; [REDACTED]; review correspondence from G. Harper re [REDACTED]; [REDACTED] telephone call with G. Harper re same; review correspondence from G. Harper to S. Gray re stipulation; review correspondence from S. Gray re same
03/10/21	C. Dial	0.10	Correspondence with G. Harper regarding tagging procedure for documents in Relativity
03/10/21	G. Harper	3.80	Multiple emails with CDial re review of client documents and things to do; research re privilege issues
03/10/21	S. Stodghill	2.40	Review correspondence and discovery materials from C. Spangler; correspondence with C. Spangler re same; review correspondence from G. Harper to M. Gaddis re special exceptions and related issues; review correspondence from M. Gaddis to G. Harper re special exceptions; review draft argument section under Texas Rule of Civil Procedure 47(c); review correspondence re same; review correspondence from M. Gaddis re same; telephone call to G. Harper re narrative introduction to special exceptions filing; correspondence with M. Gaddis and G. Harper re same; telephone call with G. Harper re response to status request on numerous topics from CHUBB; review memorandum concerning privilege

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Date	Attorney/Other Prof	Hours	Description
			research from A. Jereige; review correspondence from A. Jereige re same; correspondence with A. Jereige re same; correspondence with G. Harper re peer review privilege
03/11/21	C. Dial	0.20	Correspondence with G. Harper and Resource Center regarding inputting data into Relativity documents
03/11/21	G. Harper	2.60	Draft and edit status report; research re same; review client documents; call with CDial re document review issues
03/11/21	S. Stodghill	0.90	Telephone cal from G. Harper re status report and related issues; review correspondence from G. Harper re same; correspondence with G. Harper re same; review correspondence from G. Harper re same; telephone call to G. Harper re same
03/12/21	C. Dial	2.50	Review and note potential arguments in opposition to Mr. Thomas's response to motion to dismiss; call with G. Harper regarding status of case documents; correspondence with Resource Center regarding [REDACTED] [REDACTED]
03/12/21	M. Gaddis	2.40	Review and analyze Plaintiff's response brief to Motion to Dismiss; work on issues for reply brief
03/12/21	G. Harper	2.90	Call and email with CDial re document review and additional materials needed from client; multiple emails with client re case status and strategy; review and edit draft interrogatories to serve on plaintiff; call with SStodghill re same; call and email CSpangler re same; review response to motion to dismiss; call and email clients re same; call with SStodghill re same and strategy for same
03/12/21	S. Lemajeur	4.40	Draft Defendants' First Request for Production of Documents
03/12/21	C. Spangler	1.90	Review and revise draft interrogatories (1.30);

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Date	Attorney/Other Prof	Hours	Description
			communications re same (.10); review draft document requests (.40); communications re same (.10)
03/12/21	S. Stodghill	2.60	Telephone call with G. Harper re revision to status report and related issues; review correspondence and materials from K. Wardell; review response filed by P. Thomas in opposition to defendants' motion to dismiss for failure to state a claim, proposed order and appendix; review notice from the Court re same; review correspondence re same; correspondence with Winston and Strawn team re same; review revised status report; review correspondence from C. Spangler re same; review correspondence from G. Harper; correspondence with G. Harper and K. Wardell; review and revision to case assessment; correspondence with G. harper re same; review draft defendants' first set of interrogatories to plaintiff; review correspondence from C. Spangler re same; correspondence with G. Harper re case assessment; correspondence with C. Spangler re additional interrogatories and revision to discovery requests; review correspondence from C. Spangler re update assessment; correspondence with C. Spangler re same; review correspondence from C. Spangler re discovery requests
03/13/21	S. Stodghill	0.90	Review correspondence from G. Harper to clients re response to motion to dismiss; review correspondence from G. Harper to client re appendix re same; telephone call to G. Harper re analysis of same and reply issues; correspondence with client re analysis of same
03/15/21	C. Dial	3.80	Review Mr. Thomas's factual allegations in response to motion to dismiss and compare with factual allegations contained in the complaint; call with G. Harper regarding status of case documents; correspondence with Resource Center regarding [REDACTED] [REDACTED]

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Date	Attorney/Other Prof	Hours	Description
03/15/21	M. Gaddis	1.50	Review and analyze MTD response and work on issues for reply; call team to discuss same
03/15/21	G. Harper	3.00	Review response to motion to dismiss; multiple calls with team re issues for reply; call with KMarcom re same and things to do; call with team re reply brief; and strategy for same; research re reply
03/15/21	K. Marcom	2.70	Analyze Plaintiff's Response to Motion to Dismiss; confer with team re next steps for Reply; work on reply brief
03/15/21	C. Spangler	3.00	Review and analyze plaintiff's response to motion to dismiss (1.50); review complaint (.50); prepare outline of potential reply arguments (.50); conference with internal team re same (.50)
03/15/21	S. Stodghill	1.70	Review correspondence from G. Harper re reply brief; review correspondence from C. Spangler re same; review correspondence from C. Dial re same; correspondence with G. Harper re same; review correspondence from G. Harper re same; review correspondence from K. Marcom re same; review correspondence from K. Marcom; review correspondence re scheduling of call related to reply to response to motion to dismiss; review correspondence from C. Spangler re same; conference call with WS team; review correspondence from P. Burton; review correspondence [REDACTED]; telephone call to G. Harper re same; correspondence with G. Harper re same
03/16/21	C. Dial	0.20	Correspondence with G. Harper and Resource Center regarding inputting data into Relativity documents
03/16/21	G. Harper	1.60	Multiple emails with consulting expert about engagement issues; multiple calls with Mrs. Wardell re same ; [REDACTED]

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Date	Attorney/Other Prof	Hours	Description
			[REDACTED] [REDACTED]; update clients re same; call with SStodghill re same and strategy for reply brief on motion to dismiss; call with CDial re document review issues
03/16/21	K. Marcom	2.00	Analyze Response Brief; work on outline for reply
03/16/21	C. Spangler	1.50	Review and analyze case law cited in plaintiff's brief
03/16/21	S. Stodghill	1.60	Telephone call to G. Harper re [REDACTED] [REDACTED]; review correspondence from M. Gaddis re reply brief; correspondence with M. Gaddis re reply brief; review correspondence from M. Gaddis re same; telephone call with G. Harper re reply brief; review materials and correspondence re document gathering for case and production; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call with G. Harper re same; review correspondence from G. Harper to K. Wardell re [REDACTED]; review [REDACTED] [REDACTED] review .co re same; review correspondence from G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call with G. Harper re same
03/17/21	C. Dial	0.20	Correspondence with Resource Center regarding coding of documents in Relativity
03/17/21	M. Gaddis	1.00	Work on reply brief issues
03/17/21	K. Marcom	1.70	Draft outline for reply brief; research case law on [REDACTED]; review complaint and compare to response brief
03/17/21	A. Polvino	7.50	Review client documents and update metadata as needed
03/17/21	S. Stodghill	0.60	Review materials in support of reply brief and

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Date	Attorney/Other Prof	Hours	Description
			related legal research; correspondence with K. Marcom re reply brief; telephone call re document retention and production
03/18/21	M. Gaddis	4.20	Review plaintiff's MTD response and work on issues for reply brief
03/18/21	G. Harper	2.00	Call with SStodghill re reply brief; revise same
03/18/21	A. Polvino	1.30	Review client documents and update metadata as needed
03/18/21	S. Stodghill	1.30	Telephone call to G Harper re reply brief; review multiple correspondence and materials re same
03/19/21	C. Dial	0.40	Correspondence with G. Harper, S. Stodghill, S. McMillen, K. Marcom, and Judge O'Connor's chambers regarding locating the paper copy of the motion to dismiss
03/19/21	G. Harper	4.00	Draft and revise status memorandum; multiple emails and calls with clients re same; [REDACTED]; call with client re [REDACTED]; call with team re issues with judge and courtesy copies of briefing
03/19/21	K. Marcom	1.60	Work on Reply Brief
03/19/21	A. Polvino	3.30	Review client documents and update metadata as needed
03/19/21	S. Stodghill	1.90	Review revised case assessment requested by CHUBB and recent revisions to same; telephone call with G. Harper re revisions to same; review correspondence from G. Harper to clients re same; correspondence with clients re case assessment and related issue; review memorandum from C. Dial re request from Judge O'Connor; correspondence with C. Dial re same; telephone call to G. Harper re same; review correspondence from C. Dial; telephone call from G. Harper re same; review

WINSTON & STRAWN LLP

Cook Children's Health Care System

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Date	Attorney/Other Prof	Hours	Description
			correspondence from C. Dial re same; correspondence with C. York re same; review correspondence from P. Burton re indemnification clause in engagement letter; telephone call to G. Harper re same; review correspondence from C. Dial re same; correspondence with C. Dial re same; review related correspondence; review correspondence from G. Harper to P. Burton
03/20/21	A. Polvino	4.00	Review client documents and update metadata as needed
03/21/21	K. Marcom	3.00	Draft reply brief
03/22/21	C. Dial	4.80	Review client documents for missing data and documents; tagging documents for issues
03/22/21	G. Harper	2.30	[REDACTED] call with SStodghill re [REDACTED]; multiple emails and calls with client re update to Chubb re litigation status; review client documents; attention to discovery matters
03/22/21	K. Marcom	6.20	Research cases following Comcast; review Complaint and Plaintiff's response to Motion to Dismiss; draft Reply brief
03/22/21	A. Polvino	1.30	Review client documents and update metadata as needed
03/22/21	S. Stodghill	1.60	Review correspondence from K. Wardell; telephone call with G. Harper re [REDACTED] [REDACTED]; review correspondence from J. Gallagher re case analysis; review correspondence from L. Copeland re same; review correspondence and materials to G. Harper re same; review correspondence from G. Harper to P. Burton re [REDACTED]; review related correspondence from G. Harper
03/23/21	K. Blomquist	4.00	Review client documents and update metadata as needed

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00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
03/23/21	C. Dial	6.00	Review client documents in Relativity for missing data and documents and overall understanding of timeline of events; review draft of reply in support of motion to dismiss; correspondence with M. Gaddis regarding needed research on [REDACTED]
03/23/21	M. Gaddis	6.70	Research and review additional case law for issues relating to MTD reply; review and revise draft reply brief
03/23/21	G. Harper	3.30	Multiple calls with team re discovery issues; draft and edit case assessment ; research re same; review client documents re same; multiple calls with SStodghill re strategy and status
03/23/21	K. Marcom	1.50	Revise reply brief
03/23/21	S. Stodghill	1.60	Review correspondence from G. Harper re issues in case; correspondence with G. Harper re same; correspondence with Winston & Strawn team re reply brief on motion to dismiss; review correspondence from K. Marcom re reply brief to motion to dismiss; correspondence with K. Marcom re same; telephone call with G. Harper re multiple issues related to production of documents; review draft reply sections and revision to same; review correspondence from M. Gaddis re reply brief
03/24/21	K. Blomquist	3.00	Review client documents and update metadata as needed
03/24/21	C. Dial	10.00	Research Fifth Circuit case law for M. Gaddis regarding [REDACTED]
03/24/21	M. Gaddis	8.80	Review and revise draft reply brief; communicate

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Cook Children's Health Care System

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00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
			with C. Dial re additional research for same
03/24/21	G. Harper	5.60	Multiple calls and emails with clients re case assessment and information needed for same; call with S. Stodghill re same; correspond with Ms. Birney re litigation status and strategy; review and edit reply brief re motion to dismiss; multiple calls with S. Stodghill re same; draft and edit reply; call with team re same; research re same; multiple calls with team re revisions to reply brief; edit newest version and call with team re same
03/24/21	K. Marcom	0.70	Confer with G. Harper re reply brief; work on reply brief
03/24/21	S. Stodghill	1.70	Telephone call to G. Harper re document gathering and production issues, potential experts and reply brief; review multiple correspondence from G. Harper re same; correspondence with G. Harper re same; review correspondence re same; review correspondence from c. Spangler re issues in case; review revised reply brief sections on motion to dismiss; review correspondence from C. Dial re same; telephone call to K. Marcom re same; review correspondence from C. Dial re issues in case; review redline edits to motion to dismiss reply and related correspondence from G. Harper
03/25/21	K. Blomquist	4.00	Review client documents and update metadata as needed
03/25/21	C. Dial	0.50	Review draft reply in support of motion to dismiss; correspondence with G. Harper and Resource Center regarding document production
03/25/21	M. Gaddis	0.80	Review court filing rules; review and revise reply brief; communicate with team re same
03/25/21	G. Harper	4.80	Draft and edit update to client re [REDACTED]; review and revise reply brief re motion to dismiss; multiple calls with CSpangle re same; multiple calls with

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Date	Attorney/Other Prof	Hours	Description
			SStodgill re same; call with CDial re document issues; draft list of documents needed from client; call with CDial re same; review reply brief; multiple calls and emails with clients re same; call and email with Mrs. Wardell re damage issues raised by plaintiff; draft and edit status report
03/25/21	K. Marcom	0.70	Revise reply brief
03/25/21	C. Spangler	2.50	Review opposition to motion to dismiss; review and revise draft reply brief; communications re same
03/25/21	S. Stodghill	1.80	Telephone call with G. Harper re revision to reply brief, discovery issues and other issues in case; review correspondence from G. Harper to clients re [REDACTED]; review draft revised reply brief in support of motion to dismiss; review correspondence from G. Harper re same; review correspondence from K. Wardell re [REDACTED]; review correspondence from G. Harper to clients re same; review correspondence from C. Spangler re revision to reply draft; review correspondence from G. Harper re same; review correspondence from C. Spangler re same; review revised section from M. Gaddis re medical condition; review revised and redlined version of draft reply brief; review correspondence from M. Gaddis re same; review correspondence from K. Wardell re comments to reply brief; review correspondence from G. Harper re same; correspondence with WS Team re same; review correspondence from J. Gallagher re reply brief
03/26/21	C. Dial	0.40	Review draft reply in support of motion to dismiss; correspondence with K. Marcom regarding status of paper copy; correspondence with Resource Center regarding the completion of the entry of metadata for documents in relativity
03/26/21	M. Gaddis	1.60	Review, revise, and finalize reply brief for filing;

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00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
			communicate with team re same
03/26/21	G. Harper	9.70	Multiple emails and calls with team re status of reply brief and changes needed to reply; revise and edit reply brief; call with clients re same; research re same; [REDACTED]; call with SStodghill re same; call with client re [REDACTED] and response to same
03/26/21	K. Marcom	3.30	Finalize reply brief for filing; prepare attachment of unpublished cases; confer with C. Dial re paper copies of brief for Judge O'Connor's chambers
03/26/21	C. Spangler	0.30	Communications re finalizing reply brief
03/26/21	S. Stodghill	2.60	Review revisions to reply brief from C. Spangler; review correspondence from C. Spangler re same; review correspondence from C. Spangler re final revision to reply brief to motion to dismiss; review correspondence from G. Harper re same; review correspondence from G. Harper re revision to reply brief; review correspondence from M. Gaddis re same; review correspondence from G. Harper re issues related to reply brief; review correspondence from C. Spangler re revision to reply brief; review correspondence from M. Gaddis re same; review correspondence from C. Spangler re additional revisions to reply brief; review correspondence from K. Marcom re additional revisions to reply brief; review correspondence from G. Harper re additional revisions to reply brief; review correspondence from G. Harper re edits to reply brief; review correspondence from M. Gaddis re same; review correspondence from K. Marcom re final edits to reply brief; review correspondence and revisions from M. Gaddis to reply brief; review correspondence from P. Burton re [REDACTED] [REDACTED] correspondence with G. Harper re same

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Date	Attorney/Other Prof	Hours	Description
03/29/21	C. Dial	1.80	Correspondence with G. Harper and S. Stodghill regarding necessary motion; call with G. Harper regarding agreed motion for entry of protective order; research [REDACTED]
03/29/21	G. Harper	3.40	Call with client re documents needed; follow up with team re same; review and revise discovery requests
03/29/21	C. Spangler	1.30	Finalize discovery requests; communications re same
03/29/21	S. Stodghill	2.10	Telephone call to G. Harper re discovery issues and document production; review correspondence and discovery materials in case and [REDACTED]; review correspondence from G. Harper to K. Wardell re [REDACTED]; correspondence with C. Spangler re discovery requests; telephone call with G. Harper re CHUBB status update and response; review notice re motion for entry of protective order; correspondence with C. Dial re motion for entry of protective order; correspondence with C. Dial re same; review correspondence from G. Harper re [REDACTED]; [REDACTED]; review correspondence from K. Marcom re filing and service of same; review correspondence from the Court and notice from the Court; telephone call with K. Marcom re same; review correspondence from C. Spangler re discovery requests; review request for production; correspondence re discovery request and service of same; review correspondence from M. Gaddis; review related correspondence
03/30/21	G. Harper	3.00	[REDACTED]; call with SStodghill re same and things to do; email with team re same; multiple communications with clients re

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Date	Attorney/Other Prof	Hours	Description
			documents needed; review and revise discovery requests; call with SStodghill re same
03/30/21	S. Stodghill	1.10	Telephone call with G. Harper re [REDACTED] [REDACTED] review correspondence from G. Harper re same; review correspondence from G. Harper to K. Wardell re issues and options related to same; meeting with G. Harper re multiple issues in case and service of discovery
03/31/21	C. Dial	6.60	Research Texas federal case law regarding [REDACTED] [REDACTED]; draft agreed motion for entry of protective order; review documents on relativity for missing information; note hot documents and organize a timeline of events
03/31/21	G. Harper	3.20	[REDACTED] [REDACTED]; call and email with client re same; review and edit first set of interrogatories; review and edit first set of requests for production of documents; call and email with clients re same; call with team re same
03/31/21	S. Stodghill	1.30	Telephone call with G. Harper re revision to interrogatories and request for production; review revised discovery requests; review correspondence re same; telephone call with G. Harper re [REDACTED] [REDACTED] review revised discovery requests and correspondence from C. Spangler; correspondence with C. Spangler re same; review correspondence from G. Harper to clients re comments to discovery requests; review correspondence from C. Spangler re same; review correspondence from P. Burton re [REDACTED]; review correspondence from G. Harper re same

Total Hours 287.80

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2811823

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06/25/21

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Sub-Total Legal Services	\$247,198.00
Less 10% Discount	(24,719.80)
Total for Legal Services	\$222,478.20

Timekeeper Summary

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	43.60	1,245.00	54,282.00
C. Spangler	11.70	965.00	11,290.50
M. Gaddis	27.00	965.00	26,055.00
G. Harper	85.30	1,085.00	92,550.50
A. Jereige	10.10	660.00	6,666.00
C. Dial	47.10	610.00	28,731.00
K. Marcom	23.40	795.00	18,603.00
S. Lemajeur	11.20	580.00	6,496.00
K. Blomquist	11.00	95.00	1,045.00
A. Polvino	17.40	85.00	1,479.00
Total Attorney/Other Prof	287.80		247,198.00

Disbursements & Other Charges

Description	Amount
Court Costs and Fees	213.00
Total Disbursements & Other Charges	\$213.00

Total Due This Invoice	\$222,691.20
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WINSTON & STRAWN LLP

Cook Children's Health Care System

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Invoice Date	06/25/21
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Summary of Accounts Receivable

<u>Date of Invoice</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments/ Adjustments</u>	<u>Balance Due</u>
06/21/21	2806719	34,245.00	0.00	34,245.00
06/21/21	2806721	104,578.20	0.00	104,578.20
06/21/21	2806724	200,162.46	0.00	200,162.46
06/25/21	2807413	32,379.00	0.00	32,379.00
		<u>371,364.66</u>	<u>0.00</u>	<u>371,364.66</u>
Total Balance Due				\$371,364.66

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2811823
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

Revised Invoice
 Original Invoice: 2807351

Client Remittance Copy

Total Fees	\$222,478.20
Total Disbursements	213.00
Total Due This Invoice	\$222,691.20
Prior Balance Due	254,046.35
Total Now Due	\$476,737.55

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2811823
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

Remittance Advice

Please include this remittance page with your payment

Total Fees	\$222,478.20
Total Disbursements	213.00
Total Due This Invoice	\$222,691.20
Prior Balance Due	254,046.35
Total Now Due and Owing	\$476,737.55

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
Via Mail: Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	Via Delivery Service: Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2811824
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

Revised Invoice

Original Invoice: 2807412

For Legal Services Rendered Through April 30, 2021 In Connection With:
00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
04/01/21	C. Dial	5.20	Research Texas federal case law regarding [REDACTED] [REDACTED]; draft agreed motion for entry of protective order
04/01/21	C. Dial	1.10	Review documents on relativity for missing information; note hot documents and organize a timeline of events
04/01/21	S. Stodghill	0.60	Correspondence with G. Harper and C. Spangler re service of document requests and interrogatories; review correspondence from G. Harper re same; correspondence with G. Harper re same
04/02/21	C. Dial	7.90	Research Texas federal case law regarding [REDACTED] [REDACTED]; draft and revise agreed motion for entry of protective order; send draft to S. Stodghill, G. Harper, and C. Spangler
04/02/21	C. Spangler	0.40	Review, analyze and communications re 5th circuit summary judgment decision (.30); communications re discovery (.10)
04/02/21	S. Stodghill	2.60	Telephone call with G. Harper re service of interrogatories and requests for production on plaintiff's counsel; review multiple correspondence re same; review revised materials re same; review research re Fifth Circuit case law [REDACTED] [REDACTED]; review correspondence from C. Spangler

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Cook Children's Health Care System

Invoice No.	2811824
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00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
			re same; correspondence with clients re same; review correspondence from K. Wardell re comments to interrogatories and requests for production; correspondence with K. Wardell re same; review correspondence from G. Harper and revised discovery requests; review draft update number 2 and related correspondence to K. Wardell from G. Harper; telephone call to G. Harper re revisions to same; review correspondence from K. Wardell re discovery requests; review correspondence from C. Spangler re issues in case; review correspondence from G. Harper re interrogatories; review correspondence from C. Spangler re same; review correspondence from G. Harper re same; review correspondence from S. Gray re document issues in case; review correspondence re same; review related correspondence; review correspondence re service of discovery in case
04/03/21	C. Spangler	0.50	Review and comment upon draft motion for protective (.20); review and communications re Exeter agreement (.30)
04/05/21	C. Dial	1.80	Review documents on relativity for missing information; note hot documents and organize a timeline of events
04/06/21	C. Dial	1.40	Review documents on relativity for missing information; note hot documents and organize a timeline of events
04/06/21	S. Stodghill	0.30	Review correspondence from K. Wardell re [REDACTED]; [REDACTED]; review correspondence from G. Harper to K. Wardell re same; review correspondence from G. Harper re scheduling of call with K. Wardell
04/07/21	S. Stodghill	0.30	Telephone call with G. Harper re [REDACTED]; [REDACTED]; review correspondence re same; correspondence with G. Harper re same; review correspondence from G.

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Cook Children's Health Care System

Invoice No.

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Invoice Date

06/25/21

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00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
			Harper re same
04/14/21	C. Dial	0.80	Review documents in anticipation of discovery from Dr. Thomas; organize case timeline and look for potential documents that are missing
04/14/21	S. Stodghill	0.60	Review correspondence from G. Harper to C. Spangler re request for extension of time to respond to discovery; review correspondence from G. Harper to K. Wardell re same; correspondence with G. Harper re same; telephone call to G. Harper re same
04/20/21	S. Stodghill	1.30	Review correspondence from C. Dial re scheduling order in case; correspondence with C. Dial re same; telephone call to G. Harper re same; telephone call with G. Harper re multiple issues related to discovery in case; review multiple correspondence re same
04/21/21	S. Lemajeur	3.20	Research EEOC FOIA request requirements; draft and submit EEOC FOIA request
04/21/21	C. Spangler	0.70	Conference with G. Harper re case status (.60); communications re FOIA request to EEOC
04/21/21	S. Stodghill	0.40	Review correspondence from C. Spangler re FOIA to the EEOC; review EEOC FOIA request; telephone call with G. Harper re issues in case
04/26/21	C. Spangler	0.20	Communications re response to FOIA request
04/26/21	S. Stodghill	0.90	Review correspondence from C. Dial; review recent filings and correspondence
04/27/21	C. Dial	3.90	Review client documents in relativity to note important documents, missing metadata, and missing categories of documents needed for discovery
04/27/21	S. Lemajeur	1.60	Review documents received from the EEOC in response to a FOIA request

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Cook Children's Health Care System

Invoice No.

2811824

Invoice Date

06/25/21

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00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
04/27/21	S. Stodghill	0.90	Review EEOC FOIA response; review correspondence from C. Spangler re same; review correspondence from EEOC; review documents related to same; review notice from the Court; review electronic order and correspondence from the Court
04/28/21	S. Lemajeur	1.30	Review documents received from the EEOC in response to a FOIA request
04/28/21	C. Spangler	0.30	Review and respond to communication re review of EEOC file
04/28/21	S. Stodghill	0.30	Telephone call with G. Harper re multiple discovery and scheduling issues in case; review notice from the Court
04/30/21	S. Stodghill	0.60	Telephone call to G. Harper re recent developments in case and state legislature and scheduling order; review multiple correspondence re same; multiple correspondence re same

Total Hours 39.10**Sub-Total Legal Services****\$30,001.50****Less 10% Discount****(3,000.15)****Total for Legal Services****\$27,001.35****Timekeeper Summary**

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	8.80	1,245.00	10,956.00
C. Spangler	2.10	965.00	2,026.50
C. Dial	22.10	610.00	13,481.00
S. Lemajeur	6.10	580.00	3,538.00
Total Attorney/Other Prof	39.10		30,001.50

WINSTON & STRAWN LLP

Cook Children's Health Care System

Invoice No.

2811824

Invoice Date

06/25/21

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00004 Cook Childrens v Dr. Patrick Thomas

Disbursements & Other Charges

Description	Amount
Air Courier	24.55
Court Costs and Fees	16.00
Document Imaging & OCR	4.40
Electronic Discovery Services	2,717.20

Total Disbursements & Other Charges **\$2,762.15**

Total Due This Invoice **\$29,763.50**

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Cook Children's Health Care System

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00004 Cook Childrens v Dr. Patrick Thomas

Summary of Accounts Receivable

<u>Date of Invoice</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments/ Adjustments</u>	<u>Balance Due</u>
06/21/21	2806719	34,245.00	0.00	34,245.00
06/21/21	2806721	104,578.20	0.00	104,578.20
06/21/21	2806724	200,162.46	0.00	200,162.46
06/25/21	2807413	32,379.00	0.00	32,379.00
		<hr/> 371,364.66	<hr/> 0.00	<hr/> 371,364.66
Total Balance Due				\$371,364.66

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2811824
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

Revised Invoice
 Original Invoice: 2807412

Client Remittance Copy

Total Fees	\$27,001.35
Total Disbursements	2,762.15
Total Due This Invoice	\$29,763.50
Prior Balance Due	254,046.35
Total Now Due	\$283,809.85

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2811824
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

Remittance Advice

Please include this remittance page with your payment

Total Fees	\$27,001.35
Total Disbursements	2,762.15
Total Due This Invoice	\$29,763.50
Prior Balance Due	254,046.35
Total Now Due and Owing	\$283,809.85

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
Via Mail: Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	Via Delivery Service: Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2807413
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

For Legal Services Rendered Through May 31, 2021 In Connection With:

00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
05/06/21	S. Stodghill	0.30	Telephone cal with G. Harper re discovery issues and discovery responses in case; review multiple correspondence re same
05/16/21	S. Stodghill	0.30	Review correspondence from plaintiffs re response to defendants' first request for production of documents; review correspondence re deadlines for plaintiffs to serve answers and objections to defendants' first set of interrogatories
05/17/21	C. Dial	0.30	Review discovery requests served on Cook Children's by Dr. Thomas
05/17/21	S. Stodghill	0.30	Telephone call with G. Harper re discovery issues in case and potential experts; review correspondence re discovery issues; review correspondence re deadline to respond to discovery requests
05/17/21	S. Stodghill	1.10	Review plaintiffs' interrogatories and requests for production; review correspondence from S. Gray re same; review correspondence from S. Gray re same; telephone call with G. Harper re same; review related materials re same
05/18/21	C. Dial	4.00	Review discovery Dr. Thomas's discovery responses and objections; review documents produced by Dr. Thomas; schedule meeting with G. Harper and C. Spangler to discuss strategy

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05/18/21	C. Spangler	1.00	Review Plaintiff's discovery requests (.70); communications re same (.30)
05/18/21	S. Stodghill	1.50	Review correspondence re scheduling of call from C. Spangler; review correspondence from C. Dial re same; review correspondence from G. Harper re same; review correspondence from C. Dial re same; review correspondence from S. Lemajeur re same; review related correspondence; review correspondence from C. Dial re same; review multiple sets of interrogatories and requests for production from Thomas's counsel and related correspondence; review correspondence from G. Harper re same; review correspondence re response to same; review correspondence from S. Gray re discovery requests by Thomas; review correspondence from G. Harper re same; review correspondence from S. Lemajeur re same; review correspondence from C. Spangler re same; review correspondence from C. Dial re response to discovery; review correspondence from C. Spangler re same; correspondence with C. Spangler re same
05/19/21	C. Dial	0.60	Call with C. Spangler and G. Harper regarding Dr. Thomas's discovery responses and strategies for reviewing and responding to his discovery requests; correspondence with G. Harper regarding <div style="background-color: black; height: 20px; width: 100%; margin-top: 5px;"></div>
05/19/21	S. Lemajeur	1.40	Review plaintiff's discovery requests; discuss discovery plan with C. Spangler, C. Dial, and G. Harper
05/19/21	C. Spangler	0.80	Prepare for and participate in internal strategy call
05/19/21	S. Stodghill	1.60	Telephone call with G. Harper in preparation for call with WS team re discovery plan and response to discovery requests; call with WS team re same; review request for production by plaintiff, discovery responses and discovery requests; review discovery materials in case; telephone call

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with G. Harper re production of documents,
response to discovery materials, potential
deposition, expert witness and protective order;
review multiple materials re same

05/20/21	C. Dial	4.00	Review documents produced by Dr. Thomas and discovery responses [REDACTED]
05/20/21	S. Stodghill	0.40	Telephone call with G. Harper re collection of documents for production in response to discovery requests; review materials and correspondence re same
05/21/21	C. Dial	1.30	Review documents produced by Dr. Thomas in response to discovery requests; outline a summary for clients [REDACTED]
05/23/21	S. Stodghill	0.60	Review multiple transcripts of meetings with Drs. Thomas, Britt and Larry; review correspondence re same; review transcript of second meeting and related correspondence
05/24/21	C. Dial	1.60	Correspondence with S. Lemajeur regarding [REDACTED] draft memo [REDACTED]
05/24/21	S. Lemajeur	1.00	Review plaintiff's responses to defendants' first set of interrogatories and discovery requests
05/24/21	S. Stodghill	0.70	Telephone call with G. Harper re discovery issues and document production issues in case; correspondence with G. Harper re same; meeting with G. Harper re same
05/25/21	C. Dial	6.70	Call with G. Harper regarding list of needed documents and summary for documents produced; draft memorandum summarizing [REDACTED] [REDACTED] draft list of documents requested by Dr. Thomas to gather for discovery; send list to G. Harper and C. Spangler for review

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05/25/21	S. Lemajeur	2.40	Analyze plaintiff's responses to defendant's first set of interrogatories to determine which answers are insufficient
05/25/21	C. Spangler	0.50	Review diversity survey; communications with G. Harper re same
05/25/21	S. Stodghill	2.80	<p>Telephone call with G. Harper re discovery issues; review correspondence from G. Harper re same; review materials re [REDACTED]; [REDACTED] review correspondence from G. Harper re same; correspondence with G. Harper re same; review Cook Children's inclusion, diversity and equity survey; correspondence with G. Harper re same; telephone call with G. Harper re same; correspondence with G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; review task list with G. Harper; review correspondence from G. Harper re [REDACTED]; [REDACTED] telephone call with G. Harper re same; correspondence with G. Harper re same; review revised task list from G. Harper and related correspondence; review task list [REDACTED]; [REDACTED] review correspondence from C. Spangler; review correspondence from G. Harper to C. Dial re issues in case; review correspondence from C. Dial re same; review correspondence from G. Harper to C. Dial re scheduling of call; review correspondence from C. Dial re same; review correspondence from C. Dial re issues in case; correspondence with C. Dial and G. Harper re same; review correspondence from G. Harper re issues in case; correspondence with G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call with G. Harper re issues in case</p>
05/26/21	C. Dial	1.70	<p>Update task list with necessary tasks in discovery process and send to G. Harper for review; draft and review memo regarding [REDACTED]; [REDACTED] and send to G. Harper for review</p>

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05/26/21	S. Lemajeur	0.50	Finalize analysis of [REDACTED] [REDACTED]
05/26/21	S. Stodghill	1.70	Review correspondence from C. Dial re [REDACTED] [REDACTED] review correspondence re privileged document review re same; correspondence with C. Dial and G. Harper re same; review materials re same; review memorandum from C. Dial re [REDACTED] [REDACTED] telephone call with G. Harper re same; review correspondence from C. Dial re same; correspondence with C. Dial re same; review correspondence from G. Harper re same; correspondence with G. Harper re same
05/27/21	S. Stodghill	1.20	Review multiple correspondence re discovery issues in case; review correspondence re discovery plan; review correspondence to G. Harper re same; review correspondence with G. Harper re same; review notice and correspondence re documents
05/28/21	S. Stodghill	1.50	Telephone call with G. Harper re discovery issues in case; review correspondence and materials re same; review correspondence from G. Harper to clients re document gathering and production; review list of documents for discovery responses; telephone call with G. Harper re legal research [REDACTED] [REDACTED]; review correspondence from G. Maile re scheduling of call; review correspondence from G. Harper re potential legal research

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05/29/21	S. Stodghill	0.40	Review multiple correspondence re scheduling of conference call with client re [REDACTED] review legal research re same; review correspondence from G. Maile re same
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Total Hours	42.20
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Sub-Total Legal Services	\$35,543.50
Less 10% Discount	(3,554.35)
Total for Legal Services	\$31,989.15

Timekeeper Summary

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	14.40	1,245.00	17,928.00
C. Spangler	2.30	965.00	2,219.50
C. Dial	20.20	610.00	12,322.00
S. Lemajeur	5.30	580.00	3,074.00
Total Attorney/Other Prof	42.20		35,543.50

Disbursements & Other Charges

Description	Amount
Electronic Discovery Services	389.85
Total Disbursements & Other Charges	\$389.85

Total Due This Invoice	\$32,379.00
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00004 Cook Childrens v Dr. Patrick Thomas**Summary of Accounts Receivable**

<u>Date of Invoice</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments/ Adjustments</u>	<u>Balance Due</u>
06/21/21	2806719	34,245.00	0.00	34,245.00
06/21/21	2806721	104,578.20	0.00	104,578.20
06/21/21	2806724	200,162.46	0.00	200,162.46
		<u>338,985.66</u>	<u>0.00</u>	<u>338,985.66</u>
		Total Balance Due		\$338,985.66

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2807413
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

Client Remittance Copy

Total Fees	\$31,989.15
Total Disbursements	389.85
Total Due This Invoice	\$32,379.00
Prior Balance Due	338,985.66
Total Now Due	\$371,364.66

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2807413
 Invoice Date 06/25/21
 Client Matter No. 180333.00004

Remittance AdvicePlease include this remittance page with your payment

Total Fees	\$31,989.15
Total Disbursements	389.85
Total Due This Invoice	\$32,379.00
Prior Balance Due	338,985.66
Total Now Due and Owing	\$371,364.66

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2810270
 Invoice Date 07/15/21
 Client Matter No. 180333.00004

For Legal Services Rendered Through June 30, 2021 In Connection With:

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Date	Attorney/Other Prof	Hours	Description
04/01/21	G. Harper	1.20	Review correspondence from SStodghill re discovery strategy; call with clients re same; review and revise discovery; email with team re same and work needed to finalize discovery
04/02/21	G. Harper	2.70	Draft and edit update to Chubb re case status; email and phone call with clients re same; multiple calls and emails with SStodghill re same; revise same; revise discovery; call with CSpangler re same; call with SStodgill re same
04/03/21	G. Harper	1.30	Multiple emails with opposing counsel re discovery issues and things to do re same; correspond with [REDACTED]; email with clients re same; call and email with [REDACTED] re same
04/06/21	G. Harper	2.20	[REDACTED]; call and email with clients re same; call SStodghill re same; email [REDACTED] re same and protocols for same; review invoice from [REDACTED] and call clients re same
04/09/21	G. Harper	3.60	Draft and edit memo to Chubb re case status and strategy; multiple calls and emails with client and team re same
04/13/21	G. Harper	0.20	Review and respond to email from opposing counsel re discovery deadlines

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04/14/21	G. Harper	1.00	Call with SStodghill re discovery issues and strategy for same; email with clients re same; call with SStodghill re discovery issues and case strategy
04/20/21	G. Harper	0.90	Review and respond to correspondence from CSpangler re case status and strategy; review and respond to correspondence from team re upcoming deadlines and strategy for same; multiple calls and emails re experts, case strategy, and things to do
04/21/21	G. Harper	1.90	Call and email with CSpangler re case status and strategy; review client documents re case strategy; draft list of documents needed from client; call with SStodghill re case strategy issues
04/23/21	G. Harper	1.90	Review client documents and research re claims
04/27/21	G. Harper	2.40	Review EEOC response re documents; correspond with team re same; review client documents re claims; review materials re witness statements
04/28/21	G. Harper	1.80	Multiple calls with S. Stodghill re case status and strategy; attention to discovery matters
04/30/21	G. Harper	0.30	Call with SStodghill re case status and discovery strategy
05/06/21	G. Harper	0.60	Call with SStodghill re discovery strategy and things to do; multiple emails with team re same
05/17/21	G. Harper	1.00	Review discovery served by Plaintiff; call with SStodghill re same and expert issues
05/18/21	G. Harper	3.20	Multiple calls and emails with team re [REDACTED]; research re [REDACTED]; review discovery served by Plaintiff; call with client re same; review documents produced by Plaintiff; call with client re same

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05/19/21	G. Harper	2.40	Prepare for call re privilege issues and documents; attend same; call with team re same; review materials produced by Plaintiff; call with SStodghill re discovery status and things to so; call and email CDial re documents production
05/20/21	G. Harper	1.30	Review [REDACTED] [REDACTED] correspond with client re same same; email with team re same; call with SStodghill re document collection issues and discovery plan
05/24/21	G. Harper	0.70	Call and email with SStodghill re discovery issues; meet with SStodfghill re things to do
05/25/21	G. Harper	2.60	Review [REDACTED]; communicate with CSpangler re same and [REDACTED] [REDACTED]; call and email with SStodghill re same; email to client re same; call with SStodghill re status and things to do; draft and edit case task list; review [REDACTED]; multiple calls and emails with SStodghill re same and issues relating to privilege; call with clients re same; email with [REDACTED]; call and email CDial re discovery issues; multiple calls and emails with SStodghill re case status and strategy
05/26/21	G. Harper	4.60	Call with CDial re document issues and materials needed from client; review and respond to multiple emails from SStodghill re document issues; attention to peer review issues; research re same; call with SStodghill re strategy and things to do re discovery; call with team re document review issues; research re peer review issues; review client documents re production; research re summary judgment points
05/27/21	G. Harper	1.90	Call with CDial re discovery issues; review memo re [REDACTED] [REDACTED] review and respond to client inquiry re [REDACTED]; call with Ms. Wardell re same; email and call with [REDACTED] re same

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05/28/21	G. Harper	2.70	Finalize list of documents needed from client; email to clients re same; call with SStodghill re same and case strategy; email to Chubb re status and things to do; multiple calls and emails with client re discovery issues
06/01/21	G. Harper	0.80	Call with SStodghuill re privilege issues and litigation status; email with SStodghill re [REDACTED] [REDACTED] [REDACTED]
06/01/21	S. Stodghill	1.40	Review memorandum and correspondence from G. Harper re [REDACTED] [REDACTED] [REDACTED]; correspondence with G. Harper re same; telephone call with G. Harper re same; review correspondence from G. Maile re discovery responses and related issues; review correspondence re same; review materials re responses to same
06/02/21	C. Dial	4.10	Calls with Ms. Copeland, Ms. Wardell, and G. Harper regarding collecting documents requested by Mr. Thomas and privilege issues regarding those documents; correspondence with G. Harper regarding plan for tagging documents going forward; send possible tags for documents to G. Harper for review
06/02/21	G. Harper	4.70	Call with SStodghill re discovery strategy; prepare for and attend call with clients and team re discovery responses and documents needed to gather; call with clients and outside counsel re [REDACTED] [REDACTED]; review memo [REDACTED] [REDACTED]; email to clients re same; [REDACTED] [REDACTED] [REDACTED]; [REDACTED] [REDACTED]

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06/02/21	S. Stodghill	1.90	Correspondence with G. Harper re discovery issues in case; review correspondence from G. Harper re same; telephone call with G. Harper re same; review correspondence with clients re medical privileges from G. Harper; review legal research memorandum re [REDACTED] [REDACTED]; review correspondence re scheduling of call with clients re privilege issues in case; conference call with G. Harper and clients re multiple privileges applicable to document production; telephone call with G. Harper re same; review correspondence and materials from C. Dial re privilege issues; review correspondence from G. Maile re scheduling of call with client re privilege issues
06/03/21	C. Dial	2.90	Correspondence with G. Harper and C. Spangler regarding tags needed in Relativity for reviewing documents; call with M. Schneider regarding editing tags in Relativity; review documents and update tags in Relativity
06/03/21	G. Harper	2.80	Review and respond to correspondence from CDial re document review strategy and tags needed for electronic review of production; draft and edit issue list to use for production; call with CDial re same; email to CSpangler re same; call with SStodghill re various document review issues and case strategy
06/03/21	C. Spangler	0.60	Conference with G. Harper re privilege issues, document review and production
06/03/21	S. Stodghill	0.70	Telephone call with G. Harper re discovery issues and privilege issues in case; review multiple correspondence and materials re same
06/04/21	C. Dial	0.70	Tag documents for privilege in Relativity

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06/04/21	G. Harper	1.10	Call with SStodghill re issues with peer review privilege; call with THinojosa re research needed and case background; gather materials re case and forward same
06/04/21	T. Hinojosa	0.50	Received project assignment from supervising partner attorney Geoff Harper re research [REDACTED] [REDACTED]
06/04/21	T. Hinojosa	2.30	Conducted preliminary research [REDACTED] [REDACTED]
06/04/21	T. Hinojosa	2.20	Conducted research [REDACTED] [REDACTED]
06/04/21	S. Stodghill	0.60	Telephone call with G. Harper re multiple discovery and document production issues, legal research and privilege issues in case; review materials and correspondence re same
06/06/21	S. Stodghill	0.50	Review correspondence from K. Wardell re [REDACTED] [REDACTED]; correspondence with K. Wardell re scheduling of call to discuss same; review multiple correspondence re same

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06/07/21	G. Harper	4.60	<p>Review and respond to multiple client emails re [REDACTED]; multiple calls with SStodghill re same; prepare for and attend call with clients and team re same and [REDACTED]; review and respond to client correspondence re [REDACTED]; review sample [REDACTED] re same; review email from client re materials [REDACTED]; review and revise same; call with Mrs. Wardell re same; [REDACTED]</p>
06/07/21	T. Hinojosa	2.70	<p>Complied research findings re [REDACTED] into preliminary memorandum for assigning partner attorney Geoffrey Harper.</p>
06/07/21	S. Stodghill	2.70	<p>Review multiple correspondence re scheduling of call re privilege issues in case; telephone call to G. Harper re same and deposition of key witness; review multiple correspondence from G. Maile re same; review correspondence from G. Harper re same; telephone call with G. Harper re [REDACTED]; review multiple correspondence and materials re discovery responses to discovery requests; review legal research re privilege issues; telephone call with G. Harper in preparation for call with client re privilege issues; review correspondence re same; review correspondence from G. Harper to client re same; review correspondence from L. Copeland re same; review correspondence from G. Harper to K. Wardell re same; review sample [REDACTED] and related correspondence from K. Wardell; conference call with clients, G. Harper and J. Hopkins re privilege issues in case; review privilege materials from K. Wardell; telephone call with G. harper re privilege issues in case; review draft [REDACTED] and related correspondence from K. Wardell</p>

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06/08/21	C. Dial	2.90	Tag documents for privilege in Relativity; review additional documents from Ms. Maile for responsiveness to discovery requests; call with S. Lemajeur regarding tagging documents for privilege
06/08/21	G. Harper	3.50	Multiple emails with client and team re [REDACTED] issues and status of document collection and review; review and respond to correspondence from THinojosa re [REDACTED]; call with THinojosa re results of research; multiple calls and emails with clients re same and [REDACTED]; research re same; review and respond to correspondence from CDial re status of document collection and strategy for same
06/08/21	T. Hinojosa	0.50	Participated in phone call with Geoff Harper reporting on research findings re [REDACTED]
06/08/21	T. Hinojosa	0.80	Composed email to assigning attorney re [REDACTED]
06/08/21	S. Lemajeur	0.60	Discuss document review assignment in Relativity with C. Dial; review privilege research memorandum
06/08/21	S. Stodghill	0.50	Review correspondence from G. Maile re scheduling of call re privilege issues; review correspondence from G. Harper re same; review correspondence from G. Maile re same
06/08/21	S. Stodghill	1.20	Telephone call re multiple discovery and privilege issues in case; review multiple correspondence and materials re same; review correspondence from G. Maile re scheduling of call; review correspondence from K. Wardell re same; meeting with C. Dial re review of privilege documents; telephone call re materials related to [REDACTED]

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06/09/21	C. Dial	3.80	Review additional documents from Ms. Maile for responsiveness to discovery requests; note document requests for which we still need to locate responsive documents
06/09/21	G. Harper	1.10	Review correspondence [REDACTED] [REDACTED] [REDACTED] review and edit [REDACTED] [REDACTED]
06/09/21	T. Hinojosa	0.30	Responded to email from Geoff Harper re [REDACTED] [REDACTED]
06/09/21	S. Lemajeur	1.70	Review and tag produced documents in Relativity
06/09/21	S. Stodghill	0.30	Review correspondence from K. Wardell re issues related to S. Martin; correspondence with K. Wardell and G. Harper re same; review correspondence from K. Wardell re scheduling of call
06/10/21	C. Dial	1.50	Review additional documents from Ms. Maile for responsiveness to discovery requests; note document requests for which we still need to locate responsive documents
06/10/21	G. Harper	0.90	Review and respond to client inquiry re [REDACTED] [REDACTED]; call with team re same; call with Ms. Wardell re [REDACTED] [REDACTED]
06/10/21	T. Hinojosa	0.30	Call with Geoff Harper re status of research [REDACTED] [REDACTED]
06/10/21	S. Lemajeur	2.50	Review and tag relevant documents produced in Relativity
06/10/21	S. Stodghill	2.00	Review correspondence from K. Wardell re additional production issues; telephone call with K. Wardell re same; telephone call with G. Harper re multiple discovery and privilege issues in case; review materials and correspondence re same;

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telephone call re document production and privilege issues; review multiple correspondence re document production, privilege list and related issues; telephone call re legal research issues

06/11/21	C. Dial	0.60	Review additional documents from Ms. Maile for responsiveness to discovery requests; note document requests for which we still need to locate responsive documents; call with G. Harper regarding status of privilege research and getting T. Hinojosa involved in tagging documents in Relativity and need to tag for confidentiality conforming with protective order
06/11/21	G. Harper	1.70	Call and email with client re [REDACTED]; [REDACTED]; email with Ms. Hopkins re same and strategy for dealing with issues; email to opposing counsel re extension needed for responding to discovery
06/11/21	S. Stodghill	1.90	Review correspondence from G. Harper to K. Wardell re [REDACTED]; review legal research re [REDACTED]; telephone call with G. Harper re same; review correspondence and materials from G. Harper to J. Hopkins re [REDACTED]; telephone call with G. Harper re [REDACTED]; [REDACTED]; review correspondence and additional legal research re same; telephone call with G. Harper re same
06/12/21	G. Harper	0.30	Review and respond to email from opposing counsel re discovery issues
06/13/21	G. Harper	1.20	Draft and edit email to opposing counsel re discovery issues; review and respond to email from opposing counsel re possible employment for Plaintiff and issues re same; multiple emails with client re same
06/14/21	C. Dial	0.80	Send summary of categories missing responsive documents to G. Harper for review; call with T. Hinojosa regarding tagging documents in Relativity for privilege

WINSTON & STRAWN LLP

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06/14/21	G. Harper	1.30	Review and respond to email from THinojosa re [REDACTED]; multiple calls and emails with client re same; review and respond to correspondence from opposing counsel re issues with future employment of Dr. Thomas
06/14/21	T. Hinojosa	0.30	Met with Claire Dial to discuss project re reviewing client documents to tag for privilege and confidentiality issues.
06/14/21	T. Hinojosa	1.00	Reviewed client documents to tag for confidentiality and privilege issues.
06/14/21	S. Stodghill	1.10	Review stipulation for date and related correspondence; review correspondence from S. Gray re stipulation; review correspondence from G. Harper to S. Gray re same; review correspondence from S. Gray re same; review correspondence from G. harper re same; review correspondence from S. Gray re same; correspondence with G. Harper re same; telephone call with G. Harper re same and discovery issues in case; review correspondence re same; review correspondence from S. Gray re issues in case
06/15/21	C. Dial	5.60	Call with team regarding strategy for privileged documents; send list of missing documents to Ms. Maile and review her notes on list; review list [REDACTED]; tag documents in Relativity for privilege
06/15/21	G. Harper	4.80	Review and respond to email from SStodghill re discovery status and privilege issues re same; prepare for call with team and clients re privilege issues with documents; multiple emails with Ms. Hopkins re [REDACTED]; multiple calls with THinojosa re same; call with Ms. Hopkins re [REDACTED]; attend call with clients and team re same; review and respond to email [REDACTED]

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[REDACTED]; multiple emails with clients re same

06/15/21 T. Hinojosa 0.30 Prepared for call with client's in house and outside counsel by confirming the results of research [REDACTED]
[REDACTED]

06/15/21 T. Hinojosa 1.00 Participated in phone and zoom calls with client's in-house and outside counsel re [REDACTED]
[REDACTED]

06/15/21 T. Hinojosa 0.50 Met with Geoff Harper to debrief call with client's in-house and outside counsel re [REDACTED]
[REDACTED].

06/15/21 S. Stodghill 0.90 Correspondence with G. Harper and C. Dial re status of discovery and privilege issues in case; review correspondence from G. Harper re status of discovery response and privilege issues; correspondence with G. Harper re same; review draft materials related to responses to discovery requests and privilege logs

06/16/21 C. Dial 7.80 Correspondence with G. Harper regarding versions of agreed protective order; review latest agreed protective order for classifications of confidential information; review documents on Relativity and tag for confidentiality status

06/16/21 G. Harper 3.80 Call and email with CDial re document production issues; review protective order; call to client re same and strategy; review and respond to client email re confidentiality issues and need for redaction; review and respond to multiple emails from opposing counsel re possible new employment for Dr. Thomas; multiple emails with client re same and reference issues; email with opposing counsel re reference issues; review and respond to client inquiry re [REDACTED]
[REDACTED]; call with SStodghill re case strategy

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06/16/21	S. Stodghill	2.60	Review correspondence from S. Gray re issues in case; review correspondence from G. Harper re same; review correspondence from S. Gray re same; review correspondence from G. Harper re same; review correspondence from G. Harper re same
06/17/21	C. Dial	5.70	Tag documents in Relativity for privilege and confidentiality status; meet with T. Hinojosa to discuss confidentiality tagging for documents; email G. Harper regarding drafting discovery responses and objections
06/17/21	G. Harper	3.20	Review and respond to multiple emails from SStodghill re status of discovery responses and strategy for same; review and respond to email from CDial re responses and objections to discovery; review client documents
06/17/21	T. Hinojosa	0.30	Met with supervising attorney Claire Dial re confidentiality and privilege tagging of client documents.
06/17/21	T. Hinojosa	1.30	Reviewed and tagged client documents for confidentiality and privilege issues.
06/17/21	S. Stodghill	0.90	Correspondence with G. Harper and C. Dial re status of discovery and privilege issues in case; review correspondence from G. Harper re status of discovery responses and privilege issues; correspondence with G. Harper re same; review draft materials related to responses to discovery requests and privilege logs
06/18/21	G. Harper	3.70	Draft and edit discovery responses; review and respond to client email re materials requested by consulting expert and ability to provide same; call with SStodghill re [REDACTED] [REDACTED]; research re same; review client documents re same

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06/18/21	S. Stodghill	0.40	Further review multiple materials and legal research re [REDACTED]; telephone call with G. Harper re same
06/21/21	C. Dial	4.00	Tag documents in Relativity for privilege and confidentiality status; confer with T. Hinojosa to discuss confidentiality tagging for documents; review new documents uploaded to share drive by Ms. Maile and Ms. Nettle
06/21/21	G. Harper	3.60	Edit discovery responses; call with client re same; review client documents re privileg issues
06/21/21	T. Hinojosa	4.00	Reviewed and tagged documents for privilege/confidentiality and issue relevancy.
06/22/21	C. Dial	7.50	Tag documents for privilege and confidentiality in preparation for document production; correspondence with G. Harper regarding drafting discovery responses; review discovery requests from Dr. Thomas for potential objections and issues to discuss with client; begin drafting responses to interrogatories and requests for production
06/22/21	G. Harper	3.20	Review and respond to email with CDial re discovery responses and strategy for same; continue work on [REDACTED] issues; call to client re same; research re same; review client documents re discovery responses and privilege issues
06/22/21	T. Hinojosa	2.00	Reviewed client documents and tagged for confidentiality, privilege and issue relevance.
06/22/21	T. Hinojosa	2.00	Reviewed client documents and tagged for confidentiality, privilege and issue relevance.
06/23/21	G. Harper	2.00	Work on discovery responsesl; review client materials re same

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06/23/21	T. Hinojosa	0.50	Reviewed and tagged client documents for privilege and confidentiality.
06/23/21	T. Hinojosa	0.80	Reviewed and tagged client documents for confidentiality and privilege.
06/23/21	S. Stodghill	1.10	Review correspondence from S. Gray re discovery responses; telephone call with G. Harper re multiple issues related discovery; review draft response to plaintiff's discovery requests; review multiple correspondence re same; telephone call with G. Harper re [REDACTED] and privilege log
06/24/21	C. Dial	6.50	Tag documents for privilege and confidentiality in preparation for document production; review discovery requests from Dr. Thomas for potential objections and issues to discuss with client; draft objections and responses to interrogatories and requests for production
06/24/21	G. Harper	3.60	Multiple calls with SStodghill re discovery issues; review and respond to emails from opposing counsel re same and deadlines for same; multiple calls with clients re documents and privilege issues; multiple calls and emails with CDial re same
06/24/21	S. Stodghill	1.10	Review correspondence from S. Gray re discovery response deadlines in case; telephone call to G. Harper re same; correspondence with G. Harper re same; review correspondence form G. Harper re same; review correspondence from G. Harper to S. Gray re same; telephone call with G. Harper re same; review correspondence from G. Harper re same
06/25/21	C. Dial	5.20	Draft objections and responses to interrogatories and requests for production; call with clients and G. Harper regarding approach to responding to discovery and next steps needed to do so; correspondence with M. Schneider regarding getting documents uploaded to Relativity for

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tagging; review documents produced by Cook Children's for any missing categories of documents

06/25/21	G. Harper	2.30	Draft and edit discovery responses; call with MSchneider re client document issues; multiple calls with teams re discovery and privilege issues; call with clients and team re same
06/25/21	S. Stodghill	0.60	Review correspondence from G. Harper re privilege issues in case; correspondence with G. Harper re same; review correspondence form G. Harper re same
06/28/21	C. Dial	5.80	Draft objections and responses to interrogatories and requests for production; correspondence with M. Schneider regarding getting documents uploaded to Relativity for tagging and steps needed from client; review documents produced by Cook Children's for any missing categories of documents and send summary to Ms. Nettle; call with Ms. Nettle regarding documents to upload; correspondence with Ms. Nettle regarding outstanding documents and status of those requests
06/28/21	G. Harper	3.70	Review order on motion to dismiss; multiple calls with SStodghill re same and things to do; draft email to clients re results of motion to dismiss and strategy going forward; call with clients re motion to dismiss and next steps; work on discovery responses and document production
06/28/21	S. Lemajeur	0.40	Review the Court's order re Defendants' Motion to Dismiss
06/28/21	S. Stodghill	2.60	Review notice from the Court and related correspondence; review order granting in part and denying in part Cook Childrens' motion to dismiss; telephone call to G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call with G. Harper re discovery issues in case; review correspondence from G. Harper to clients

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re order on Cook's motion to dismiss and analysis of same; correspondence with client and WS team re next steps in case; telephone call with G. Harper re opinion of the Court and strategic next steps in case; review opinion of the Court on Cook Childrens' motion to dismiss; review correspondence from G. Harper re same

06/29/21	C. Dial	8.80	Draft objections and responses to interrogatories and requests for production; correspondence with M. Schneider and Ms. Nettle regarding getting documents uploaded to Relativity for tagging; call with G. Harper regarding responses to discovery; send finished draft to G. Harper for review
06/29/21	G. Harper	5.70	Work on discovery responses' review client documents re same; multiple calls and emails with team re same
06/29/21	S. Stodghill	0.60	Telephone call with G. Harper re response to interrogatories and response to request for production; review draft responses to interrogatories and requests for production; review related correspondence and materials re discovery responses
06/30/21	C. Dial	8.30	Revise objections and responses to interrogatories and requests for production to incorporate G. Harper edits; correspondence with M. Schneider and Ms. Nettle regarding getting documents uploaded to Relativity for tagging; call with G. Harper regarding responses to discovery; send finished drafts to G. Harper for review; tag additional documents in preparation for production in Relativity
06/30/21	M. Gaddis	0.40	Review court's order and opinion on motion to dismiss

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06/30/21	G. Harper	5.90	Draft and edit objections and responses to discovery; multiple calls and emails with clients re same and changes needed; multiple calls and emails with CDial re same; multiple calls and emails with SStodghill re same and discovery status
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Total Hours 249.80**Total for Legal Services \$221,277.50****Timekeeper Summary**

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	25.60	1,245.00	31,872.00
C. Spangler	0.60	965.00	579.00
G. Harper	111.90	1,085.00	121,411.50
M. Gaddis	0.40	965.00	386.00
C. Dial	82.50	610.00	50,325.00
S. Lemajeur	5.20	580.00	3,016.00
T. Hinojosa	23.60	580.00	13,688.00
Total Attorney/Other Prof	249.80		221,277.50

Disbursements & Other Charges

Description	Amount
Electronic Discovery Services	389.85
Total Disbursements & Other Charges	\$389.85

Total Due This Invoice \$221,667.35

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Summary of Accounts Receivable

<u>Date of Invoice</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments/ Adjustments</u>	<u>Balance Due</u>
06/25/21	2807351	224,351.70	0.00	224,351.70
06/25/21	2807412	32,647.10	0.00	32,647.10
06/25/21	2807413	32,379.00	0.00	32,379.00
		<hr/> 289,377.80	<hr/> 0.00	<hr/> 289,377.80
Total Balance Due				\$289,377.80

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2810270
 Invoice Date 07/15/21
 Client Matter No. 180333.00004

Client Remittance Copy

Total Fees	\$221,277.50
Total Disbursements	389.85
Total Due This Invoice	\$221,667.35
Prior Balance Due	289,377.80
Total Now Due	\$511,045.15

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2810270
 Invoice Date 07/15/21
 Client Matter No. 180333.00004

Remittance Advice

Please include this remittance page with your payment

Total Fees	\$221,277.50
Total Disbursements	389.85
Total Due This Invoice	\$221,667.35
Prior Balance Due	289,377.80
Total Now Due and Owing	\$511,045.15

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
Via Mail: Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	Via Delivery Service: Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2815316
 Invoice Date 08/16/21
 Client Matter No. 180333.00004

For Legal Services Rendered Through July 31, 2021 In Connection With:

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Date	Attorney/Other Prof	Hours	Description
06/30/21	S. Stodghill	2.10	Telephone call with G. Harper re issues related to responses to Thomas request for production and interrogatories; review draft responses and objections to Thomas requests for production and interrogatories; review correspondence re same; review correspondence from G. Harper re objections to discovery requests; correspondence with G. Harper and C. Dial re same; review revised discovery responses and related correspondence from G. Harper; correspondence with G. Harper re same
07/01/21	C. Dial	5.00	Correspondence with M. Schneider and Office Services regarding getting documents scanned and uploaded to Relativity for tagging and steps needed from client; correspondence with G. Harper and T. Hinojosa regarding modifying tags on certain documents in relativity; tag documents for production and privilege status in relativity
07/01/21	G. Harper	3.90	Multiple emails with C. Spangler re case strategy and privilege issues; review client documents re privilege and production; multiple calls with team and clients re privilege issues; review incident reports re comparators
07/01/21	D. Hinojosa	0.80	Reviewed documents and tagged for confidentiality, privilege, and issue relevance.
07/01/21	C. Spangler	2.20	Consideration re summary judgment and strategy for plaintiff's deposition

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07/01/21	S. Stodghill	2.30	Review multiple discovery responses to interrogatories and requests for production; review related correspondence; review correspondence from G. Harper re same; review correspondence from C. Spangler re same; review correspondence from G. Harper to opposing counsel re discovery responses; review correspondence from G. Harper re privilege issues in case; .core with G. Harper re same; review correspondence from G. Harper re discovery responses; correspondence with G. Harper re same; review correspondence from C. Hopkins re production of documents, privilege issues and in camera documents; telephone call to G. Harper re same; telephone call with G. Harper re discovery issues in case
07/02/21	C. Dial	2.40	Correspondence with M. Schneider regarding inputting data for documents in Relativity; tag documents for production and privilege status in Relativity
07/02/21	G. Harper	2.90	Call to C. Spangler re case strategy and [REDACTED]; multiple calls and emails with C. Dial re document production and review of materials; continue examination of client documents and witness reports
07/02/21	D. Hinojosa	1.50	Reviewed newly delivered client documents and tagged for privilege, confidentiality, and issue relevance.
07/05/21	S. Stodghill	0.40	Telephone call with G. Harper re document production, conference with opposing counsel re same and privilege issues, privilege log and discovery issues; review related correspondence
07/06/21	D. Bloomquist	3.80	Review client documents and update metadata as needed

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07/06/21	C. Dial	2.70	Correspondence with M. Schneider regarding inputting data for documents in Relativity; tag documents for production and privilege status in Relativity; correspondence with T. Hinojosa regarding need to tag documents for redactions
07/06/21	D. Hinojosa	3.60	Reviewed documents and tagged for confidentiality, privilege, responsiveness, and issue relevance.
07/06/21	S. Stodghill	0.70	Telephone call with G. Harper re discovery agreement re peer review privilege; review multiple correspondence and materials potentially to be produced; telephone call with G. Harper re document gathering and review issues
07/07/21	C. Dial	3.50	Tag documents for production, redaction, and privilege status in Relativity;
07/07/21	G. Harper	2.90	Review correspondence from opposing counsel re discovery issues; multiple emails with C. Spangler re same and case status; call with C. Spangler re case strategy and discovery issues; multiple emails with opposing counsel re discovery issues; multiple calls and emails with S. Stodghill re discovery issues and strategy for same; research re client documents and discovery; call with clients re same
07/07/21	C. Spangler	1.50	Conference with G. Harper re discovery issues; consideration re same; conference with team re case strategy
07/07/21	S. Stodghill	2.30	Review correspondence from S. Gray re multiple discovery issues; correspondence with G. harper re same; telephone call to G. Harper re same; review correspondence from G. Harper to opposing counsel re discovery dispute and document production; review multiple correspondence re same; review correspondence from C. Hopkins re agreed protective order and document production; review correspondence re supplemental initial disclosures and insurance information; review

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correspondence from C. Hopkins re same; review correspondence from S. Gray re document production; correspondence with S. Gray re document production; review correspondence from C. Hopkins re same; review correspondence from G. Harper; review correspondence from S. Gray re document discovery issues; correspondence with S. Gray re same; telephone call with G. Harper re document production issues; review correspondence from G. Harper re same; correspondence re same; review correspondence from S. Gray re same

07/08/21	C. Dial	4.80	Tag documents for production and privilege status in Relativity; meeting with E. Halpern regarding case background and document tagging needed; meeting with G. Harper regarding next steps in preparation for producing documents
07/08/21	E. Halpern	3.90	Meet and confer with C. Dial re case background and document tagging; review background case materials; begin tagging documents.
07/08/21	G. Harper	3.70	Multiple calls with C. Dial re litigation documents, discovery issues, and things to do; multiple emails with team re same; call with S. Stodghill re discovery issues; call and email with clients re discovery issues; review correspondence re Thomas employment referral; call and email with Mrs. Wardell re same; review client documents; revise interrogatories
07/08/21	S. Stodghill	2.60	Review correspondence from G. Harper re document discovery and production issues in case; correspondence with G. Harper re same; telephone call to G. Harper re same; review multiple correspondence with plaintiff's counsel re document production, confidentiality order and other discovery issues; correspondence with G. Harper re same; review correspondence from G. Harper re same; review correspondence from C. Dial re document review and privileged documents; review correspondence from C. Dial re document review and privilege issues; review

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correspondence from G. Harper re same;
correspondence re same; review correspondence
from C. Dial re same

07/09/21	C. Dial	7.30	Tag documents for production and privilege status in Relativity; correspondence with G. Harper and M. Schneider regarding next steps in production; review tagged documents for proper confidentiality status and redact documents when necessary; produce documents to opposing counsel
07/09/21	E. Halpern	9.50	Continue tagging documents; confer with C. Dial re production strategy.
07/09/21	D. Hinojosa	2.20	Reviewed and tagged documents for relevance, responsiveness, privilege, confidentiality, issue relevance, and redactions.
07/09/21	S. Stodghill	0.70	Telephone call with G. Harper re discovery agreement re peer review privilege; review multiple correspondence and materials to potentially be produced; telephone call with G. Harper re document gathering and review issues
07/12/21	C. Dial	4.80	Tag documents for production and privilege status in Relativity
07/12/21	E. Halpern	2.70	Continue tagging documents.
07/12/21	G. Harper	0.40	Multiple emails with opposing counsel re privilege issues and conference needed on same; email and call with S. Stodghill re same
07/12/21	D. Hinojosa	2.50	Reviewed and tagged documents for responsiveness, privilege, confidentiality, issue relevance and needed redactions.
07/12/21	S. Stodghill	1.40	Telephone call with G. Harper re scheduling of call with opposing counsel; review correspondence from G. Harper re same; telephone call re document production and privilege issues; review multiple correspondence from C. Dial re same; review correspondence re same; review correspondence from G. Harper re same; review

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correspondence from G. Harper re scheduling of call with opposing counsel re document production and privilege issues; correspondence with G. Harper re same; review correspondence from G. Harper re issues related to same

07/13/21	C. Dial	6.10	Tag documents for production and privilege status in Relativity; correspondence with M. Schneider and opposing counsel regarding their access to our produced documents; call with opposing counsel regarding the production of privileged documents and status of discovery going forward
07/13/21	E. Halpern	2.20	Continue tagging documents.
07/13/21	G. Harper	2.80	Review and respond to correspondence from opposing counsel re litigation issues; review and respond to correspondence from C. Dial re same call with opposing counsel re discovery issues; multiple calls with team and clients re same; review email from client re [REDACTED]; call and email with C. Spangler re same and strategy
07/13/21	C. Spangler	1.10	Review and analyze [REDACTED]
07/13/21	S. Stodghill	0.50	Review correspondence from S. Gray re document production and other issues in case; review correspondence from C. Dial re same; review correspondence from S. Gray to C. Dial re same; telephone call to G. Harper in preparation for call with S. Gray
07/14/21	C. Dial	5.90	Tag documents for production and privilege status in Relativity; meeting with G. Harper regarding steps needed for second production and redaction of documents; team meeting regarding strategy for discovery, mediation, and summary judgment moving forward
07/14/21	E. Halpern	8.60	Continue tagging documents.

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07/14/21	G. Harper	0.80	Strategy call with team; work on discovery; email with opposing counsel re same; work on interrogatories
07/14/21	D. Hinojosa	1.00	Reviewed client documents and tagged for responsiveness, privilege, confidentiality, issue relevance, and needed redactions.
07/14/21	S. Lemajeur	0.50	Conference call re case updates and discovery plan
07/14/21	C. Spangler	0.30	Conference with G. Harper re [REDACTED] [REDACTED]
07/14/21	C. Spangler	0.50	Participate in update and strategy call
07/14/21	S. Stodghill	1.20	Conference call with G. Harper and C. Spangler re strategic issues and tasks in case; telephone call with G. Harper re same; review materials re production of 3800 documents, peer review documents and privilege log; review materials in preparation for Thomas deposition; review multiple correspondence re deposition notice; review correspondence from S. Gray re mediation; correspondence with G. Harper re potential mediator; telephone call to G. Harper re potential mediator; review correspondence from G. Harper re potential mediators; correspondence with G. Harper re selection of same
07/15/21	C. Dial	5.00	Tag documents for production and privilege status in Relativity; note documents requiring redaction; correspondence with G. Harper about specific documents requested by plaintiff
07/15/21	E. Halpern	9.30	Continue to tag documents for production.
07/15/21	G. Harper	3.70	Draft and edit motion to entry of protective order; email to opposing counsel re same; email to client re numerous issues with case, discovery and strategy; phone call with Mrs. Wardell re same; attention to planning and scheduling mediation; work on document production issues

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07/15/21	C. Spangler	0.30	Communications re document production
07/15/21	S. Stodghill	2.60	Review correspondence from S. Lemajeur re document production; review correspondence from S. Gray re mediation; correspondence with S. Gray re scheduling of mediation; correspondence with G. Harper re scheduling of mediation; review correspondence from mediator; review correspondence from G. Harper re scheduling of mediation; correspondence with G. Harper re same; review correspondence from E. Halpern re redaction to produced documents; review correspondence from C. Dial re issues related to document production; review multiple correspondence re document production, privilege log and redactions; review correspondence from S. Gray re mediation; review correspondence from G. Harper re same; review correspondence from S. Gray re mediation; review correspondence from S. Gray to mediator re dates for mediation; review correspondence from opposing counsel re discovery agreements; correspondence with G. Harper re same; review correspondence from G. Harper re same; telephone call with G. Harper re scheduling of call re [REDACTED]
07/16/21	C. Dial	7.60	Tag documents for production and privilege status and redact in Relativity; correspondence with G. Harper about specific documents requested by plaintiff and methods for redactions
07/16/21	E. Halpern	3.30	Complete tagging of documents for production.
07/16/21	G. Harper	4.30	Attention to mediation and multiple calls and emails with clients and opposing counsel re same; call with client re issues with answer; call with C. Spangler re same; call with S. Stodghill re same; draft answer; research re same; call with C. Dial peer review issues; email and call Mrs. Wardell re same; multiple emails with Mrs. Wallace re discovery and documents; multiple emails and calls with Mrs. Wardell re case strategy, status, and things to do

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07/16/21	S. Stodghill	2.20	Telephone call with G. Harper re answer to case; review correspondence from G. Harper re same; meeting with G. Harper re answer, investigation and other issues in case; review correspondence and draft answer; review correspondence from J. Shipp re confirmation of mediation; review correspondence from S. Gray re scheduling of mediation; review correspondence from G. Harper to S. Gray re scheduling of mediation; review correspondence from S. Gray re mediation; review correspondence from S. Gray re same; review correspondence from G. harper re [REDACTED] [REDACTED]
07/17/21	G. Harper	5.70	Research re answer; review client documents re same; draft answer
07/17/21	S. Stodghill	0.60	Review revised mediation confirmation from E. Morgan; review multiple materials from mediator; review fee scheduling and rules for mediation; review correspondence from E. Morgan re mediation details and requests
07/18/21	C. Dial	4.90	Redact documents in Relativity for relevancy and privilege; pull documents cited in the complaint for G. Harper to review
07/18/21	E. Halpern	3.10	Continue to redact documents for privilege.
07/18/21	G. Harper	6.30	Draft answer; research re same; review documents re same; call with S. Stodghill re status and strategy
07/18/21	S. Stodghill	1.20	Review correspondence from E. Morgan re details and requests from mediator in preparation for mediation; correspondence with C. Dial and G. Harper re same; telephone call to G. Harper re answer; telephone call with G. Harper re answer; telephone call with G. Harper re answer; review correspondence from C. Dial re mediator's request for materials; correspondence with C. Dial re same

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07/19/21	C. Dial	8.60	Redact documents in Relativity for relevancy and privilege; call with G. Harper regarding documents to be produced and guidance for production; revise task list and send to S. Stodghill for review; research [REDACTED] and send to S. Stodghill and C. Spangler for review; finalize production and send to plaintiff
07/19/21	E. Halpern	2.00	Continue to redact documents for privilege.
07/19/21	G. Harper	10.70	Draft and edit original answer; research re same; multiple calls and emails with Mrs. Copeland re same and edits needed; attention to discovery; call with S. Stodghill re case status, answer, and discovery issues; call with T. Melsheimer re strategy for answer; call with client re issue regarding [REDACTED]; call with S. Stodghill re same; review and respond to email [REDACTED]; research re [REDACTED]; email to C. Spangler re same; call with S. Stodghill re answer and affirmative defenses; review correspondence from opposing counsel re expert disclosures; call with team re same and things to do
07/19/21	C. Spangler	1.50	Review and revise answer to complaint (1.20); communications re same (.30)
07/19/21	S. Stodghill	4.30	Review correspondence from S. Gray re issues related to mediation; correspondence re same; review correspondence from J. Shipp re mediation; correspondence with C. Dial and C. Spangler re updated and revision to task list; review correspondence from C. Dial re same; correspondence with C. Dial re same; review correspondence from C. Dial with materials requested by mediator; review updated task list and correspondence from C. Dial; correspondence with C. Dial re same; review draft answer and related correspondence from G. Harper; telephone call with G. Harper re affirmative defenses; review correspondence from C. Dial re document

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production; telephone call to C. Dial re same and affirmative defenses; correspondence with G. Harper re additional information from client related to answer and affirmative defenses; review correspondence from S. Gray re FRCP 26(a)(2) disclosures (experts) and same; review correspondence from S. Gray re issues in discovery; correspondence with G. Harper re same; review correspondence from G. Harper re answer; correspondence with G. Harper re same; correspondence with C. Spangler re affirmative defenses and document production; correspondence with G. Harper re answer and affirmative defenses; review correspondence from C. Spangler re same; correspondence with C. Spangler re same; telephone call with G. Harper re multiple issues related to answer and affirmative defenses; correspondence with C. Dial re revised task list; meeting re issues and strategic game plan in case

07/20/21	C. Dial	7.80	Redact documents in Relativity for relevancy and privilege; correspondence with G. Harper regarding documents to be produced and guidance for production; revise task list and send to S. Stodghill for review
07/20/21	E. Halpern	3.00	Further redaction of documents for privilege.
07/20/21	G. Harper	5.90	Revise answer; email to clients and team re same; research re same; call with Mrs. Copeland re changes needed to answer; multiple emails with S. Stodghill re answer, affirmative defenses, and case strategy; work on reviewing and redacting peer review documents; multiple calls and meetings with team re same; draft and edit revised interrogatories; email with opposing counsel re status of production; meet with S. Stodghill re same and things to do
07/20/21	C. Spangler	2.50	Begin Plaintiff's deposition outline

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07/20/21 S. Stodghill

6.10 Review correspondence from S. Gray re document production issues in case; review related correspondence; review correspondence from C. Dial re same; telephone call to G. Harper re service of answer and affirmative defenses; review Thomas expert disclosures and related correspondence; correspondence with Winston team re same; review correspondence from C. Dial re revised task list; correspondence with C. Dial re same; review correspondence from C. Dial to S. Gray re second document production; review correspondence from C. Dial to S. Gray re Thomas expert disclosures; review correspondence from S. Gray re document production issues; review correspondence from C. Dial re affirmative defenses; review correspondence from C. Spangler re additional defenses; review correspondence from C. Dial to clients re expert disclosures; correspondence with C. Dial re same; review correspondence from C. Spangler re additional defenses; review revised answer and additional defenses; review correspondence from G. Harper re same; correspondence with G. Harper re same; telephone call with G. Harper re same; telephone call with G. Harper re response to recent discovery letter from S. Gray; review correspondence from G. Harper to S. Gray and C. Hopkins re response to discovery letters; review revised task list and related issues from C. Dial; correspondence with C. Dial re same; review correspondence from G. Harper re additional revisions to answer; correspondence with G. Harper re same; review correspondence from C. Dial re redaction of production of documents; correspondence with C. Dial re same; telephone call to C. Dial re document production issues; telephone call to A. Wright re document production; correspondence with C. Dial and A. Wright re redaction of documents; telephone call to A. Wright re same; review correspondence from A. Wright re same; review correspondence from G. Harper re answer; correspondence re same

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07/20/21	A. Wright	0.80	Review sample document redactions for consistency; call with C. Dial re document production and redactions; review and analyze documents to apply relevant redactions
07/21/21	C. Dial	12.60	Redact documents in Relativity for relevancy and privilege; correspondence with G. Harper regarding documents to be produced and guidance for production; gather documents for production set and correspondence with C. Myers regarding production; meeting with T. Hinojosa and Z. Miller regarding redaction guidance
07/21/21	E. Halpern	3.00	Further redaction of documents for privilege.
07/21/21	G. Harper	4.60	Review materials from investigator; call with C. Dial re same and status of production; work on interrogatories; research re same; draft and edit email to opposing counsel re work verification issues; review and respond to client emails re same
07/21/21	S. Lemajeur	0.60	Redact privileged documents in document production
07/21/21	Z. Miller	3.10	Document review re privilege redactions
07/21/21	S. Stodghill	2.40	Telephone call with G. Harper re multiple issues related to answer and future motion for summary judgment; review correspondence and revised answer related to same; telephone call re revisions to discovery letter from S. Gray; review final answer; review notice from the court re filing and service of same; review correspondence re same; telephone call from G. Harper re same; review correspondence from L. Copeland re same; review correspondence from K. Wardell re same; telephone call with G. Harper re response to discovery letters in case; review correspondence from A. Wright; review correspondence from B. Hunter re same; review correspondence from M. Segedy; review correspondence from A. Wright re same; review correspondence from J. Shipp re mediation; correspondence with J. Deemer re legal research; telephone call with A. Wright re

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document production issues; multiple correspondence and telephone calls re issues related to document production; review correspondence re privilege issues and privilege log

07/21/21	A. Wright	3.00	Continue to review and analyze documents for redactions and production
07/22/21	C. Dial	8.60	Redact documents in Relativity for relevancy and privilege; correspondence with G. Harper and S. Stodghill regarding documents to be produced and guidance for production; gather documents for production set and correspondence with C. Myers regarding production; send final production set to opposing counsel
07/22/21	E. Halpern	1.80	Continue to redact documents.
07/22/21	G. Harper	5.50	<p>[REDACTED]; call with C. Dial re [REDACTED]; review plaintiff's expert report; draft email to C. Spangler re opinion and need for rebuttal expert; research re same; call with S. Stodghill re same and overall case strategy; work on discovery and production; call with C. Dial re status of same; work on interrogatories; call with team re same</p>
07/22/21	D. Hinojosa	0.70	Reviewed and redacted client documents in preparation for production.
07/22/21	D. Hinojosa	0.60	Reviewed and redacted client documents in preparation of production.
07/22/21	D. Hinojosa	2.00	Reviewed and redacted documents in preparation for production.
07/22/21	S. Lemajeur	3.40	Redact privileged documents for document production
07/22/21	Z. Miller	6.00	Document review re privilege material

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07/22/21	C. Spangler	2.60	Continue plaintiff's deposition outline; communications re responsive expert; review and analyze plaintiff's expert designations
07/22/21	S. Stodghill	2.90	Telephone call with G. Harper re expert rebuttal witness; review materials and correspondence re same; review correspondence from C. Dial to opposing counsel re document production; review correspondence from C. Spangler re potential expert rebuttal witness; correspondence with C. Spangler re rebuttal expert; telephone call with G. Harper re same; further review of plaintiffs expert disclosures; review correspondence from G. Harper to C. Spangler re rebuttal expert; review correspondence from C. Spangler re same; review correspondence from G. Harper to C. Spangler re plaintiffs damages opinion; review correspondence from C. Spangler re rebuttal expert; correspondence with C. Spangler re same; correspondence re same; review correspondence from C. Spangler; correspondence re rebuttal expert witness
07/22/21	A. Wright	6.70	Continue to review and analyze documents for redactions and production
07/23/21	C. Dial	5.60	Redact documents in Relativity for relevancy and privilege; correspondence with G. Harper and S. Stodghill regarding documents to be produced and guidance for production; gather documents for production set and correspondence with C. Myers regarding production; send final production set to opposing counsel; review [REDACTED]
07/23/21	E. Halpern	2.00	Continue to redact documents for privilege.
07/23/21	G. Harper	6.90	Call with C. Spangler re expert needed and strategy for same; multiple calls and emails with S. Stodghill re same; multiple calls with Mrs. Copeland re discovery and various issues re same; multiple calls with Mrs. Wardell re same; multiple calls and emails with Ms. Maile re materials

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			needed for discovery; draft and edit interrogatory answers; review client documents
07/23/21	D. Hinojosa	1.00	Reviewed and redacted client documents in preparation of production.
07/23/21	D. Hinojosa	1.20	Reviewed and redacted client documents in preparation of production.
07/23/21	D. Hinojosa	1.30	Reviewed and redacted client documents in preparation of production.
07/23/21	D. Hinojosa	0.70	Reviewed and redacted client documents in preparation of production.
07/23/21	Z. Miller	5.20	Redact privileged information from documents for production
07/23/21	C. Spangler	1.00	Analysis and communications re damages expert
07/23/21	S. Stodghill	1.80	Review multiple correspondence re document production, privilege issues and privilege log; telephone call with G. Harper re same; telephone call with G. Harper re expert rebuttal witness; review correspondence from G. Harper re rebuttal expert; review correspondence re potential rebuttal expert; correspondence with G. Harper re same; review correspondence from C. Spangler re same; review correspondence from D. Leiden re same; review correspondence from A. Aurisch re rebuttal expert; review correspondence from D. Scheper re same; review correspondence from C. Dial re document production; review correspondence from C. Dial re same; review correspondence from G. Harper re potential expert witness; correspondence with G. Harper re same
07/23/21	A. Wright	5.50	Continue to review and analyze documents for redactions and productions
07/24/21	E. Halpern	3.00	Further redaction of documents for privilege.
07/24/21	G. Harper	2.70	Draft and edit discovery responses; research re same

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07/24/21	S. Stodghill	1.10	Review correspondence and materials from G. Harper re potential rebuttal expert on damages and other experts for case; telephone call with G. Harper re same; multiple correspondence re same
07/25/21	E. Halpern	2.70	Further redaction of documents for privilege.
07/25/21	G. Harper	2.30	Draft and edit discovery responses; research re same
07/26/21	A. Aurisch	0.70	Review case background in preparation for rebuttal expert search; research potential rebuttal experts
07/26/21	C. Dial	1.10	Correspondence with G. Harper and S. Stodghill regarding production status; correspondence with C. Myers regarding additional documents from client for review; update task list with expert deadlines and send to S. Stodghill; calendar remaining deadlines and reminders for those deadlines for S. Stodghill, C. Spangler, and G. Harper
07/26/21	E. Halpern	9.20	Further redaction of documents.
07/26/21	G. Harper	4.90	Work on discovery responses; call with clients re same; work on document production issues; call with A. Aurisch re expert issues; call with team re plan for rebuttal experts and strategy for same; email with opposing counsel re discovery status; call with Mrs. Wardell re document production issues; call and email with team re same; review event reports from client; review email from opposing counsel re Thomas employment issues; call and email with clients re same; review correspondence from opposing counsel re protective order; call with team re same
07/26/21	D. Hinojosa	1.50	Reviewed and redacted client documents in preparation for production.
07/26/21	D. Hinojosa	1.00	Reviewed and redacted client documents in preparation for production.

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07/26/21	C. Spangler	0.20	Communications re protective order
07/26/21	S. Stodghill	4.30	<p>Correspondence with G. Harper and C. Dial re status of document production, redaction for privilege and privilege log; correspondence with G. Harper re response to discovery letter; telephone call to G. Harper re document production; review correspondence from G. Harper re economic damages expert, medical recruiter expert and attorney's fee expert; correspondence with C. Dial and G. Harper re same; correspondence with G. Harper and C. Dial re expert disclosure deadline; review correspondence re discovery issues from S. Gray; telephone call to G. Harper re response to same; review correspondence from G. Harper re expert disclosure; review correspondence from G. Harper re discovery issues in case; correspondence with G. Harper re same; review revised task list and related correspondence from C. Dial; review correspondence from A. Aurisch re potential experts; correspondence with A. Aurisch re same; correspondence with G. Harper re rebuttal expert report; correspondence from G. Harper re same; correspondence with G. Harper and A. Aurisch re same; review correspondence from A. Aurisch re same; telephone call with G. Harper re [REDACTED]</p> <p>[REDACTED]; conference call with A. Aurisch and G. Harper re multiple expert disclosure issues; review correspondence from S. Gray re agreed motion for entry of protective order; review correspondence from S. Gray re response from Medical Staff Services; review correspondence from C. Dial re issues in case; correspondence with C. Dial re same; review correspondence from C. Spangler re protective order; correspondence with C. Spangler and C. Dial re same; review correspondence from C. Spangler re same; correspondence with C. Spangler re same</p>

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07/27/21	C. Dial	1.20	Review documents in Relativity for relevancy and privilege; review order on parties' agreed motion for entry of protective order
07/27/21	E. Halpern	9.00	Continue to redact documents.
07/27/21	G. Harper	2.60	Review and respond to correspondence from S. Stodghill re case strategy; revise motion for protective order and order; arrange for filing of same; work on discovery responses; review new event reports; email opposing counsel re discovery issues; review court order on protective order; multiple calls and emails with C. Spangler re same; multiple calls with clients re same and issues raised by denial of motion; multiple calls with S. Stodghill re same; call with C. Dial re same and discovery issues
07/27/21	S. Stodghill	2.50	Review multiple correspondence from C. Dial re deadlines in case; review correspondence from G. Harper re plaintiff's expert disclosures; review correspondence from G. Harper to client re same; review correspondence from G. Harper to S. Gray re hospital certification; review correspondence from G. Harper to A. Aurisch re materials in case for expert disclosure; review correspondence from C. Spangler re issues in case; review correspondence from G. Harper to C. Spangler re same; review correspondence from C. Dial re responsive expert designation and report; review related correspondence from C. Dial; review correspondence from C. Spangler re protective order; review correspondence from C. Dial re same; review correspondence from C. Dial re same; review correspondence from C. Spangler re protective order; correspondence with G. Harper re same; review correspondence and multiple resumes of potential rebuttal damages experts; review correspondence from G. Harper to S. Gray re filing of agreed motion for protective order; review correspondence from G. Harper re same; telephone call with G. Harper re denial of motion for protective order; review notice from the Court,

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order and related correspondence; review resumes of potential experts and related correspondence from A. Aurisch; correspondence with A. Aurisch and G. Harper re same

07/28/21	A. Aurisch	1.10	Analyze plaintiff's expert report and prepare questions re same for expert search; contact potential rebuttal experts Dr. Helen Reynolds, Nick Buzas, and Dennis Arnie
07/28/21	C. Dial	0.10	Call with G. Harper regarding summary of claim for insurance company
07/28/21	E. Halpern	1.40	Continue redaction of documents.
07/28/21	G. Harper	3.30	<p>[REDACTED];</p> <p>correspond with Ms. Wardell re same; review consulting expert early results; [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]; call with Mrs. Wardell re additional documents requested by Exeter and issues with same; review and respond to correspondence from A. Aurisch re expert issues; call with S. Stodghill re same; work on revised discovery responses</p>
07/28/21	S. Stodghill	2.00	<p>Multiple correspondence with G. Harper re discovery, document production issues and protective order; review multiple correspondence and materials re same; multiple telephone calls with G. Harper re same; review correspondence from A. Aurisch re Helen Reynolds as potential expert witness; correspondence with A. Aurisch re same; review correspondence from G. Harper re scheduling of call with R. Merrill; review correspondence from G. Harper re potential expert witness; correspondence with G. Harper and A. Aurisch re same; review multiple correspondence re same; review correspondence from A. Aurisch re potential experts; review correspondence from A. Aurisch re same; review correspondence from G. Harper re same</p>

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07/29/21	A. Aurisch	1.90	Prepare questions for rebuttal experts; analyze documents/information needed re plaintiff; exchange correspondence and teleconference with potential rebuttal expert Dr. Helen Reynolds; teleconference with recruiting expert Wesley Millican and draft summary re same
07/29/21	C. Dial	5.30	Review previous insurance case summaries and summary form; review plaintiff's expert report and summarize inclusions; call with G. Harper regarding next steps for document production, insurance summary, and needed redactions
07/29/21	G. Harper	6.30	Call with team re status and things to do; call with S. Stodghill and A. Aurisch re status and strategy for rebuttal experts; multiple emails and calls with team and client re recruiting expert; multiple calls with Mr. Millican re scope of expert needed and interview Mr. Millican re same; email with K. Birney re mediation issues; draft report to K. Birney re case evaluation and mediation issues; call with C. Dial re same; research re same; multiple calls with A. Aurisch re expert issues; research re [REDACTED] email to opposing counsel re discovery issues and concerns about protective order; review and respond to multiple emails from opposing counsel re Dr. Thomas's new job and Cook referral issues; multiple emails with client re same; review and approve revised letter re same
07/29/21	S. Stodghill	3.30	Multiple correspondence with G. Harper re potential expert witnesses; review correspondence from S. Gray re Nebraska hospital requests; review correspondence from G. Harper re same; telephone call with G. Harper re same; review correspondence from S. Gray re issues in case; review multiple correspondence and materials from Omaha Children's Hospital; review correspondence from G. Harper re potential expert witness; conference call with A. Aurisch and G. Harper re potential expert witnesses; telephone call with G. Harper re expert witnesses, scheduling of depositions, response to Omaha Children's and

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other issues in case; review correspondence from A. Aurisch re potential expert witness; review correspondence from G. Harper to S. Gray re scheduling of call; review correspondence from G. Harper re same to S. Gray; review correspondence from S. Gray re Nebraska Hospital request; review correspondence from S. Gray re multiple issues in case; review correspondence from G. Harper re same; review correspondence from G. Harper to S. Gray re response to Nebraska hospital; review correspondence from S. Gray re same; conference call re protective order; telephone call with G. Harper re Nebraska hospital issues; review correspondence from G. Harper re potential recruiting expert; correspondence with G. Harper and A. Aurisch re same; review correspondence from A. Aurisch re same

07/30/21	A. Aurisch	0.90	Exchange correspondence and teleconference with Dr. Helen Reynolds; exchange correspondence with potential expert Nick Buzas; analyze exhibits to plaintiff's economic expert's report; analyze [REDACTED] [REDACTED]
07/30/21	C. Dial	6.40	call with G. Harper regarding next steps for document production, insurance summary, and needed redactions; draft insurance case status summary for G. Harper's review
07/30/21	E. Halpern	3.80	Continue to redact documents.
07/30/21	G. Harper	4.90	Research re possible attorneys' fee expert' call with team re same; research re [REDACTED] [REDACTED]; work on discovery responses; call with S. Stodghill re affirmative discovery issues and information needed; multiple calls and emails with C. Spangler re same; prepare for conference call with opposing counsel and C. Spangler re discovery issues and protective order; attend conference call; work on status and strategy memo for Ms. Birney; call with C. Dial re same; email with opposing counsel re need for demand

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07/30/21	S. Lemajeur	1.30	Draft notice of deposition
07/30/21	C. Spangler	2.20	Conferences with G. Harper re discovery, plaintiff's deposition; conference with G. Harper, opposing counsel; review deposition notice; communications re damages expert
07/30/21	S. Stodghill	2.30	Review correspondence from G. Harper re potential attorney's fees expert; telephone call to G. Harper re same and additional experts in case; telephone call with G. Harper re [REDACTED]; telephone call re update to insurer; prepare for call with S. Gray re discovery disputes; review materials re [REDACTED]; correspondence with C. Spangler and G. Harper re scheduling of Dr. Thomas deposition; telephone call re material request by insurance company; review correspondence from C. Spangler re deposition notice for Dr. Thomas; review correspondence from G. Harper to C. Spangler re deposition notice for Dr. Thomas and additional discovery request; review correspondence from C. Spangler re deposition notice; review correspondence from G. Harper re same; telephone call to G. Harper re same; review correspondence from M. Gaddis re projects in case; correspondence with G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; review correspondence from S. Gray re issues in case; correspondence with G. Harper re same; review correspondence from C. Spangler to S. Gray; review correspondence from S. Gray re same; telephone call with G. Harper re protective order on filing documents under seal; review legal research re same; review correspondence from S. Gray re same

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07/31/21	G. Harper	4.90	Review event reports re method to produce and redact same in light of new court order and requirements; call with team re same; review and respond to correspondence from Ms. Birney re mediation issues; call with team re discovery status; call with C. Dial re things to do re documents
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Total Hours 439.50**Total for Legal Services \$354,155.00****Timekeeper Summary**

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	53.80	1,245.00	66,981.00
C. Spangler	15.90	965.00	15,343.50
G. Harper	102.90	1,085.00	111,646.50
C. Dial	117.30	610.00	71,553.00
E. Halpern	83.50	610.00	50,935.00
A. Wright	16.00	610.00	9,760.00
S. Lemajeur	5.80	580.00	3,364.00
A. Aurisch	4.60	745.00	3,427.00
D. Hinojosa	21.60	580.00	12,528.00
Z. Miller	14.30	580.00	8,294.00
D. Bloomquist	3.80	85.00	323.00
Total Attorney/Other Prof	439.50		354,155.00

Disbursements & Other Charges

Description	Amount
Electronic Discovery Services	2,050.00
Telecommunication Services	19.00

Total Disbursements & Other Charges \$2,069.00

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Total Due This Invoice	\$356,224.00
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2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2815316
 Invoice Date 08/16/21
 Client Matter No. 180333.00004

Client Remittance Copy

Total Fees	\$354,155.00
Total Disbursements	2,069.00
Total Due This Invoice	\$356,224.00

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
<u>Via Mail:</u> Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	<u>Via Delivery Service:</u> Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

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2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2815316
 Invoice Date 08/16/21
 Client Matter No. 180333.00004

Remittance Advice

Please include this remittance page with your payment

Total Fees	\$354,155.00
Total Disbursements	2,069.00
Total Due This Invoice	\$356,224.00

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2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2826783
 Invoice Date 10/26/21
 Client Matter No. 180333.00004

For Legal Services Rendered Through August 31, 2021 In Connection With:

00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
08/01/21	G. Harper	4.30	Continue work on document production and interrogatories; review new event reports; email with opposing counsel re same and need to redo production to comply with court order and outstanding law
08/02/21	A. Aurisch	0.10	Exchange correspondence with Dr. Helen Reynolds
08/02/21	M. Gaddis	6.30	Call G. Harper to discuss expert and summary judgment issues; review plaintiff's expert damages report; review document production
08/02/21	E. Halpern	2.70	Continue to redact documents.
08/02/21	G. Harper	7.50	Draft and edit update re mediation and case status; call and email with clients and team re same and things to do; review and respond to correspondence from opposing counsel re mediation issues; email with Ms. Bierney re litigation status and mediation issues; review client materials re surgeons and ethnicity for discovery responses; draft and edit responses to interrogatories; review and categorize event reports and prepare same for production; review and respond to multiple emails with opposing counsel re mediation demand; emails with C. Spangler re same; call with M. Gaddis re expert issues and report; call with S. Stodghill re same
08/02/21	C. Spangler	0.50	Review and comment upon mediation update; communications re Plaintiff's demand

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Date	Attorney/Other Prof	Hours	Description
08/02/21	S. Stodghill	1.40	Review correspondence from S. Gray re memorandum; review correspondence from G. Harper re same; review correspondence from G. Harper re same; review related correspondence; review correspondence from C. Spangler re mediation; review correspondence from G. Harper re same; review and comments to CHUBB summary; correspondence with G. Harper re same; telephone call with G. Harper re same; review correspondence from G. Harper re same; review correspondence from S. Gray re same; review correspondence from G. Harper re same; review correspondence from C. Spangler
08/03/21	A. Aurisch	0.80	Teleconference with Dr. Helen Reynolds; review various agreements and interrogatory responses for economic information; review documents needed for economic expert rebuttal
08/03/21	C. Dial	1.70	Call with G. Harper regarding next steps for document production and needed redactions; gather produced event reports for G. Harper to review; correspondence with C. Myers regarding previous discovery produced and access to those documents; correspondence with A. Aurisch regarding relevant documents for damages expert to review
08/03/21	M. Gaddis	3.80	Attend call with [REDACTED]; work on damages issues; review discovery responses and documents
08/03/21	G. Harper	8.30	Email with client re [REDACTED]; continue to review client documents and revise discovery responses; multiple calls with A. Aurisch re [REDACTED]; call with damages expert re case and opinion needed; multiple calls with S. Stodghill re [REDACTED]; multiple emails with clients re revised interrogatory answers; call with team re same; multiple emails and calls with Mr. Millican re expert opinions; meet with team re same; update

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Date	Attorney/Other Prof	Hours	Description
			client re same; multiple emails with opposing counsel re disclosure issues; call with counsel re same; multiple calls and emails with C. Dial re discovery issues and case strategy; work on discovery issues; revise materials re same
08/03/21	S. Stodghill	1.90	Review correspondence from A. Aurisch re potential expert interviews; review correspondence re same; telephone call with G. Harper re expert witness disclosures and opinions; telephone call re potential expert calls; review correspondence from G. Harper to S. Gray re discovery issues in case; review correspondence from S. Gray re same; review correspondence from G. Harper re same; review correspondence from S. Gray re same; review correspondence from G. Harper re same; review correspondence from opposing counsel re same; telephone call to G. Harper re same; review multiple correspondence from A. Aurisch re expert testimony; review correspondence from A. Aurisch re same; review correspondence from G. Harper re discovery plan to S. Gray
08/04/21	C. Dial	2.30	Call with G. Harper regarding next steps for document production, needed redactions, and need to review produced documents to confirm interrogatory responses; correspondence with S. Stodghill and C. Spangler regarding need to draft mediation position statement; correspondence with C. Myers and E. Halpern regarding uploading documents to Relativity database for review and redacting
08/04/21	M. Gaddis	7.90	Review and analyze plaintiff's damages expert report; research and review case law on various damages issues
08/04/21	G. Harper	7.70	Review emails from opposing counsel re further discovery; call with team re same; email with firm re FTP site needed for discovery; review client documents re production and redactions; multiple emails with C. Dial re client document issues; call

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Date	Attorney/Other Prof	Hours	Description
			with client re missing physician complaints; multiple emails with clients re same; multiple emails with opposing counsel re disclosure issues; call with team re same
08/04/21	C. Spangler	0.50	Communications re discovery and mediation statement
08/04/21	S. Stodghill	2.10	Telephone call with G. Harper re [REDACTED] [REDACTED] evaluation and request for disclosure; review correspondence re same; review materials; review correspondence from potential expert witness; telephone call re same and potential expert witness; telephone call re interrogatory response and case strategy with G. Harper and mediation position statement; review multiple correspondence and materials re interrogatories; review correspondence from S. Gray re supplementation of discovery responses; correspondence with C. Dial, G. Harper and C. Spangler re mediation position statement; telephone call with M. Gaddis re damages expert opinion and related correspondence; review correspondence from C. Dial re mediation position statement; correspondence with C. Dial re same; review draft mediation position statement and related correspondence from C. Spangler; correspondence with C. Spangler re same; review related correspondence from C. Spangler; review correspondence from G. Harper to opposing counsel re disclosure; review correspondence and supplemental document production; review correspondence from G. Harper re same
08/05/21	C. Dial	2.60	Call with G. Harper regarding next steps for document production, needed redactions, and need to review produced documents to confirm interrogatory responses; correspondence with C. Myers and E. Halpern regarding uploading documents to Relativity database for review and redacting; redact documents in Relativity database for privilege

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Date	Attorney/Other Prof	Hours	Description
08/05/21	M. Gaddis	7.20	Research and review case law [REDACTED] [REDACTED] work on summary judgment issues; review document production
08/05/21	E. Halpern	3.80	Tag and redact documents in recent production.
08/05/21	G. Harper	6.70	Draft amended discovery responses; review documents re same' research re same; multiple calls and emails with client re same; multiple calls and emails with C. Dial re same; multiple calls and emails with S. Stodghill and C. Spangler re deposition strategy; multiple emails with C. Dial re redaction and production status
08/05/21	C. Spangler	1.20	Communications re deposition notice and discovery issues (.20); review documents re analysis of event reports (.20); begin preparing for Plaintiff's deposition (.80)
08/05/21	S. Stodghill	1.90	Review correspondence from S. Gray re disclosure issues; telephone call to G. Harper re same; review correspondence from G. Harper re same; review correspondence from S. Gray re same; review correspondence from C. Hopkins re disclosures and document production; review correspondence from G. Harper to S. Gray re same; review correspondence from G. Harper to S. Gray re same; review correspondence from S. Gray re same; review correspondence from S. Gray re same; review correspondence from G. harper to S. Gray re same; review revised interrogatory responses and correspondence from G. Harper; correspondence with G. Harper re same; telephone call to G. Harper re issues in case
08/06/21	A. Aurisch	0.10	Exchange correspondence with office of Dr. Helen Reynolds
08/06/21	C. Dial	3.30	Call with G. Harper regarding next steps for document production, needed redactions, and clarifying interrogatory responses; correspondence

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Date	Attorney/Other Prof	Hours	Description
			with C. Myers and E. Halpern regarding uploading documents to Relativity database for review and redacting; redact documents in Relativity database for privilege and prepare document production set
08/06/21	M. Gaddis	3.00	Review documents; continue research and analysis on damages issues for expert report; prepare memo for G. Harper on same
08/06/21	G. Harper	9.50	Draft and edit confidentiality stipulation; call and email with C. Spangler re same; multiple emails with S. Gray re status of discovery; revise confidentiality stipulation; email opposing counsel re same; revise interrogatories; call with C. Dial re same; review materials from Ms. Wallace; meet with team re document production issues; review and respond to correspondence from opposing counsel re issues with Plaintiff's document production; email with C. Dial re same and possible solution; call with team re document production issues and strategy for same; review and respond to multiple emails from opposing counsel re discovery status and comparators; multiple calls and emails with opposing counsel re discovery; call with client re [REDACTED]; prepare materials for production
08/06/21	C. Spangler	1.10	Review and comment upon confidentiality order and communications re same (.50); review Plaintiff's discovery responses re deficiencies (.60)
08/06/21	S. Stodghill	2.20	Review correspondence from G. Harper to S. Gray re confidentiality stipulation; review revisions to same; review correspondence from S. Gray re same; review correspondence from G. Harper to C. Spangler re confidentiality stipulation; telephone call to G. Harper re same; review correspondence from C. Spangler re same; telephone call to G. Harper re issues in case; review correspondence from S. Gray re document production issues; review correspondence from S. Gray re document

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Date	Attorney/Other Prof	Hours	Description
			production; review correspondence from G. Harper re same; correspondence with G. Harper re same; review correspondence from G. Harper re same; review correspondence from S. Gray re same; review correspondence from G. Harper re same; review correspondence from S. Gray re same; review correspondence from G. Harper re same; review correspondence from S. Gray re same
08/08/21	G. Harper	5.40	Review client documents for production and revisions needed to interrogatories; review new patient complaints from client and review for production; email to C. Dial re same; review and respond to opposing counsel re deposition issues; review and respond to email from K. Bierney re mediation issues
08/09/21	A. Aurisch	1.00	Teleconference with Lea Bowman from office of Dr. Helen Reynolds;; analyze further documents needed for Dr. Reynolds
08/09/21	C. Dial	5.70	Call with G. Harper regarding next steps for document production, needed redactions, and need to review produced documents to confirm interrogatory responses; review sample employment mediation position statements and begin draft of mediation statement; correspondence with C. Myers regarding uploading documents to Relativity database for review and redacting and preparing document production; review and summarize documents produced in plaintiff's second production
08/09/21	G. Harper	8.80	Review and respond to correspondence from opposing counsel re document production and confidentiality issues; call with team re same and case strategy; email with opposing counsel re deposition issues; revise discovery responses and tables for same; review and respond to correspondence from C. Dial re discovery status; attention to confidentiality stipulation; call with clients re same; call and email with C. Dial re

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Date	Attorney/Other Prof	Hours	Description
			discovery deficiencies of plaintiff; prepare materials for production; redact documents; review demand letter from opposing counsel re discovery issues and demand for supplementation; call with C. Dial re same; call with S. Stodghill re same; draft response to same; research re same
08/09/21	C. Spangler	0.80	Conference with G. Harper, opposing counsel re discovery issues
08/09/21	S. Stodghill	4.30	Telephone call with G. Harper re revisions and redactions to interrogatory responses, related confidentiality agreement issues and potential motion to compel; meeting with G. Harper re same; review correspondence from G. Harper re same; review draft revised interrogatories and related materials and correspondence; review correspondence re same; review correspondence from S. Gray re same; review correspondence from G. Harper re same; review correspondence from C. Spangler to S. Gray re scheduling of deposition of Dr. Thomas; correspondence with C. Spangler re deposition of Dr. Thomas; review correspondence from G. Harper to S. Gray re discovery response; meeting with G. Harper re multiple discovery issues in case and preparation for deposition with potential expert witness; telephone call with M. Gaddis re expert issues and disclosures; review materials and correspondence re expert witnesses; review materials re mediation position statement and preparation for mediation; telephone call re scheduling potential Cook deposition; meeting re deposition of Dr. Thomas and Cook employees; telephone call re potential further action; telephone call re potential expert attorney fees witness; review correspondence from A. Aurisch re expert issues in case; correspondence with A. Aurisch re same; review memorandum from A. Aurisch re Bauman opinions, observations and additional requested documents/information; review correspondence and additional documents from S. Gray; telephone call to G. Harper re same; review

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Date	Attorney/Other Prof	Hours	Description
			correspondence from S. Gray; telephone call with G. Harper re same; review correspondence re same; telephone call re verification of interrogatories
08/10/21	A. Aurisch	2.30	Exchange correspondence with Lea Bowman from office of Dr. Helen re documents needed; analyze further handling for economic, mitigation, and attorneys' fees experts; exchange correspondence and teleconference with Wesley Millican; draft report for Wesley Millican; review research re discoverability of documents provided to retained expert
08/10/21	C. Dial	8.90	Review and summarize documents produced in plaintiff's second production; correspondence with A. Aurisch regarding details needed for expert reports
08/10/21	G. Harper	7.80	Review and respond to opposing counsel correspondence re peer review; research re same; call with S. Stodghill re same; call with clients re same; revise discovery responses; call with C. Dial re same; revise same; finalize and serve amended discovery; email with opposing counsel re same; review mediation materials; prepare for same; attention to expert witnesses; multiple calls and emails with A. Aurisch re status of experts; call and email with expert re same; update client and team re expert issues; multiple emails with client re new Dr. Iglesias letter; email with team re same; attention to attorneys fees expert; email with clients re same; multiple emails with opposing counsel re protective order issues; review case re discovery issues; call with C. Spangler re same; review [REDACTED] [REDACTED] review [REDACTED]; call with A. Aurisch re materials needed by expert; call with Ms. Copeland re same; email with clients re documents needed; email with opposing counsel re request for met and

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Date	Attorney/Other Prof	Hours	Description
			confer
08/10/21	C. Spangler	0.50	Review and consider documents and communications with G. Harper re same
08/10/21	S. Stodghill	2.90	Telephone call to G. Harper re interrogatory responses, confidentiality agreement, supplemental document production, response to discovery letter and expert witness designations and disclosures; review materials and correspondence re same; review and revision to letter to S. Gray re discovery disputes; correspondence with G. Harper re revision to same; meeting with G. Harper re same and expert disclosure and designation issues; review correspondence and documents from S. Gray; review first amended interrogatory responses; review correspondence from G. harper to S. Gray re same; review related materials and correspondence; review recent correspondence re same from G. Harper; telephone call to M. Gaddis re expert designations and disclosures; review draft materials for expert reports and related correspondence; review correspondence from S. Gray re peer review privilege; review correspondence from G. Harper re same; correspondence with G. Harper and C. Dial re same; review revised agreed draft protective order and related correspondence from G. Harper; telephone call to G. Harper re multiple issues in case; review correspondence from S. Gray re protective order draft; review multiple correspondence re scheduling of deposition
08/11/21	A. Aurisch	3.20	Teleconference and exchange correspondence with Lea Bowman from office of Dr. Helen Reynolds; draft report for Wesley Millican; exchange correspondence and teleconference with Kevin Briscoe
08/11/21	C. Dial	7.60	Review and summarize documents produced in plaintiff's second production; correspondence with A. Aurisch regarding details needed for expert

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Date	Attorney/Other Prof	Hours	Description
			reports
08/11/21	G. Harper	3.90	Review case provided by opposing counsel re peer review privilege and discovery; search re [REDACTED]; draft and edit correspondence to opposing counsel re peer review protection and state of case law for protective order; email with S. Stodghill re same and things to do; email with C. Dial re same and things to do
08/11/21	S. Stodghill	3.70	Review multiple correspondence with G. harper and S. Gray re supplemental document production, confidentiality stipulation and other discovery issues; multiple correspondence re expert designations and disclosures in case; review multiple correspondence re expert disclosures and designation; review correspondence from G. Harper to S. Gray re multiple discovery issues; telephone call to G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; review correspondence from G. Harper re same; review correspondence from G. Harper to S. Gray re meet and confer on discovery issues; review correspondence from S. Gray re discovery dispute and meet and confer; review correspondence from S. Gray re document production issues; correspondence with M. Gaddis and A. Aurisch re expert designation and disclosure issues; review correspondence from A. Aurish re economic damages expert; correspondence with A. Aurisch re economic damages expert and recruiting expert report and designation; telephone call re expert opinion in case; review correspondence from A. Aurisch re expert designation; review draft materials related to expert designations; telephone call re issues related to expert designations and opinion; telephone call with G. Harper re same
08/12/21	A. Aurisch	4.90	Teleconferences and exchange correspondence with Lea Bowman from office of Dr. Helen

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Date	Attorney/Other Prof	Hours	Description
			Reynolds; teleconferences with Wesley Millican; revise report of Wesley Millican; exchange correspondence and teleconference with Kevin Briscoe; analyze salary reconciliation reports for sending to expert; analyze [REDACTED] draft expert disclosures; [REDACTED] analyze remaining issues in preparation of expert disclosures
08/12/21	C. Dial	5.60	Review and summarize documents produced in plaintiff's second production; correspondence with A. Aurisch regarding details needed for expert reports; call with G. Harper and opposing counsel regarding discovery dispute; call with G. Harper regarding steps needed to redact and produce documents; team call regarding status of expert report and missing details
08/12/21	M. Gaddis	0.70	Work on expert disclosure issues; calls with A. Aurisch and G. Harper to discuss same
08/12/21	G. Harper	7.70	Review and respond to correspondence from opposing counsel re meet and confer options re discovery issues and redactions; multiple emails with opposing counsel re comparatives and documents requested; call with clients re issues with attorneys' fee expert and suggestions for same; email [REDACTED] multiple calls and emails with A. Aurisch re [REDACTED] research re [REDACTED] review and research Plaintiff's damage model; review plaintiff's documents re damages; call with opposing counsel re discovery dispute; call with team re same; call [REDACTED]
08/12/21	C. Spangler	1.40	Review and analyze key documents in preparation for mediation, plaintiff's deposition

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Date	Attorney/Other Prof	Hours	Description
08/12/21	S. Stodghill	4.60	<p>Telephone call to G. Harper re expert depositions and disclosures, discovery conference, potential motion to compel, supplemental production of documents and confidentiality stipulation and scheduling of deposition; telephone call with G. Harper re same; telephone call with G. Harper re strategic issues in case and potential motion to compel, conference with opposing counsel re discovery issues, scheduling of depositions for Dr. Thomas and others, document supplement and other issues in case; review multiple correspondence re same; review additional materials re expert disclosures and discovery of experts; prepare for call with A. Aurisch and M. Gaddis re expert depositions; review correspondence and materials re damages expert opinion; review correspondence and materials re 11,000 pages of documents produced by S. Gray in relation to expert opinion; review peer review opinion and legal research re issues in case; telephone call re scheduling of call with A. Aurisch re [REDACTED]; telephone call from G. Harper re [REDACTED]; review correspondence from G. harper to S. Gray re objections to discovery requests; review correspondence from S. Gray re meet and conference on discovery dispute issues; review correspondence from G. Harper to S. Gray re issues related to discovery; telephone call with G. Harper re same; review correspondence from S. Gray re discovery related to pediatric surgeons; review correspondence from A. Aurisch re [REDACTED]; review correspondence from A. Aurisch re Dr. Reynolds expert opinion; correspondence with A. Aurisch re same; conference call with A. Aurisch, M. Gaddis and G. Harper re Dr. Reynolds expert designation and report, Wesley Millican and attorneys fees expert designation and report; review additional draft materials and correspondence from A. Aurisch re same; telephone call with G. Harper re</p>

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Date	Attorney/Other Prof	Hours	Description
			discovery conference with S. Gray; review correspondence and materials from A. Aurisch re plaintiff's attorneys fees expert; review correspondence from A. Aurisch re expert issues in case; review correspondence from A. Aurisch to J. Cleveland; review revised materials and expert report of Wes Millican and related correspondence
08/13/21	A. Aurisch	4.50	Analyze draft economist expert report; teleconferences with Lea Bowman from office of Dr. Helen Reynolds; revise report for Wesley Millican; teleconference with Wesley Millican; draft expert disclosures
08/13/21	C. Dial	7.80	Review and summarize documents produced in plaintiff's second production; correspondence with A. Aurisch regarding details needed for expert reports; call with G. Harper regarding steps needed to redact and produce documents; review [REDACTED]
08/13/21	M. Gaddis	1.50	Research [REDACTED]; call. G. Harper to discuss expert reports
08/13/21	G. Harper	8.30	Email with opposing counsel re status of protective order; draft and edit proposed Rule 11 Agreement re discovery; email with team re Rule 11 Agreement and things to do for compliance; multiple calls and emails with A. Aurisch re expert issues; [REDACTED]; multiple calls with C. Dial re [REDACTED]; research re [REDACTED] research re [REDACTED]; draft email to team re results of research; call [REDACTED]; call and email with S. Stodghill re deposition status; finalize and execute discovery agreement; call and email with C. Dial re documents to be re-redacted

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Date	Attorney/Other Prof	Hours	Description
			and strategy for same; review client documents re re-redaction; redact documents for production and create protocol for same
08/13/21	C. Spangler	0.50	Communications with G. Harper re damages analysis and review documents re same; communications re depositions
08/13/21	S. Stodghill	3.30	Review correspondence from C. Dial re analysis of review of document produced by Dr. Thomas; correspondence re same; telephone call to G. Harper re multiple issues in case; review correspondence from G. Harper re preparation for Dr. Thomas's deposition; correspondence with C. Spangler and G. Harper re scheduling of Dr. Thomas deposition; review correspondence from C. Spangler re damages claim; correspondence with C. Dial re same; review correspondence from C. Dial re same; review correspondence from G. Harper re analysis of documents produced by Dr. Thomas; correspondence with C. Dial re same; review documents recently produced related to damages claim; review correspondence from G. Harper re scheduling of Dr. Thomas deposition; review rule 11 agreement and related correspondence from G. Harper; review legal research re confidentiality stipulation; review correspondence from C. Spangler re scheduling of Dr. Thomas deposition; review correspondence from C. Spangler re scheduling of Dr. Thomas deposition; review correspondence from G. Harper re redaction/confidentiality issues in case; review multiple materials and correspondence re expert designations and disclosures
08/14/21	G. Harper	6.20	Review [REDACTED]; email with mediator and opposing counsel re COVID and need for remote mediation; [REDACTED]; review client documents and redact same; call with C. Dial re same and instructions for redactions

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Date	Attorney/Other Prof	Hours	Description
08/15/21	A. Aurisch	0.10	Plan further handling re report for Wesley Millican
08/15/21	C. Dial	1.60	Review sample mediation position statements and mediator's form position statement; begin drafting mediation position statement and review relevant case law to cite in support
08/15/21	G. Harper	5.90	Review client documents and redact same; research re [REDACTED]; call to team re same; review draft expert report of Mr. Millican
08/16/21	A. Aurisch	4.40	Analyze revised economist expert report; teleconference with Lea Bowman from office of Dr. Helen Reynolds; revise report for Wesley Millican; review documents for W. Millican to review for opinions in report; teleconference and exchange correspondence with W. Millican; finalize expert disclosures
08/16/21	C. Dial	8.00	[REDACTED]; redact documents in Relativity for relevancy and privilege; call with G. Harper regarding method for redaction
08/16/21	M. Gaddis	3.60	Review expert materials; research and review case law on damages mitigation and prepare memo to team re same; review and revise draft mediation statement
08/16/21	G. Harper	7.90	Review and respond to email from A. Aurisch re expert reports and things to do; review and edit expert report of Mr. Millican; call with C. Dial re documents needed for experts; correspond with A. Aurisch re same; call with S. Stodghill re litigation status; multiple calls with experts re report issues; review and edit same; multiple calls and emails with A. Aurisch re expert opinions and things to do to finalize reports; call with clients re expert report opinions and things to do; call with S. Stodghill re same; draft and edit updated requests for disclosure with expert information; call and

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Date	Attorney/Other Prof	Hours	Description
			email with A. Aurisch; review and redact client documents for production
08/16/21	S. Stodghill	2.60	Review legal research re damages expert and mitigation defense; review correspondence from M. Gaddis re same; review related correspondence; review correspondence from J. Shipp re mediation; review correspondence from G. Harper re same; telephone call with G. Harper re draft disclosures and related issues; review correspondence from S. Gray re mediation; review correspondence from G. Harper re same; review [REDACTED] review [REDACTED]; review correspondence from C. Dial re same
08/17/21	C. Dial	8.30	Review M. Gaddis and S. Stodghill comments on [REDACTED]; redact documents in Relativity for relevancy and privilege; call with G. Harper regarding document status for redaction and new potential issues
08/17/21	M. Gaddis	1.00	[REDACTED]; communicate with team re same
08/17/21	G. Harper	7.80	Multiple calls and emails with clients re expert reports and things to do; review [REDACTED]; review correspondence from S. Stodghill re [REDACTED]; review and respond to correspondence from S. Stodghill re [REDACTED]; review [REDACTED]; call with team re same; redact client documents; call with team re same
08/17/21	S. Stodghill	3.40	Telephone call with G. Harper re expert designations, preparation for mediation, damages issues in case and other issues in case; review Cook expert disclosures; review exhibits to Cook expert disclosures; review correspondence from G. Harper to J. Gallagher; review correspondence from G. Harper to K. Wardell and L. Copeland re

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Date	Attorney/Other Prof	Hours	Description
			<p>same; review correspondence from A. Aurisch re expert disclosures; correspondence with Winston team re expert witness disclosures; review expert reports, CVs and related correspondence; review Millican report, CV and related correspondence;</p> <p>[REDACTED]</p> <p>correspondence; telephone call with G. Harper re related issues in case; review [REDACTED]</p> <p>[REDACTED]; review correspondence from G. Harper re same; correspondence with C. Dial and G. Harper re same; review [REDACTED];</p> <p>correspondence with C. Dial re same; review correspondence from M. Gaddis re [REDACTED]</p> <p>[REDACTED] correspondence with M. Gaddis and C. Dial re same; correspondence with C. Dial re same; review correspondence from G. Harper re expert report of Dr. Thomas; correspondence with G. Harper re same; review [REDACTED]</p> <p>[REDACTED]; review correspondence from J. Gallagher re expert disclosures; review revised redline version of mediation position statement and related correspondence from C. Dial; correspondence with C. Dial re additional issues in case</p>
08/18/21	C. Dial	8.80	Redact documents in Relativity for relevancy and privilege; call with G. Harper regarding document status; call with E. Halpern regarding redactions needed and structure for such
08/18/21	E. Halpern	5.50	Confer with C. Diale re redaction strategy; redact documents in accordance with strategy.

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Date	Attorney/Other Prof	Hours	Description
08/18/21	G. Harper	8.20	Redact [REDACTED]; call and emails with C. Spangler re [REDACTED]; review edits to same; multiple calls and emails with C. Spangler re discovery strategy and things to do; review [REDACTED]; call and email with client re meeting minutes; call with S. Stodghill re [REDACTED]; call and email with Mrs. Wardell re [REDACTED]; multiple emails with Mrs. Wardell re redactions and status of same; multiple emails with Mrs. Copeland re meeting minutes and additional documents needed; review same; call with C. Dial re status of document production and things to do
08/18/21	C. Spangler	3.60	Review [REDACTED] (1.50); communications with G. Harper re same (.10); revise and prepare deposition outline (2.0)
08/18/21	S. Stodghill	2.90	Review correspondence from C. Spangler re [REDACTED]; correspondence with C. Spangler re same, [REDACTED] G. Harper re same; review correspondence from G. Harper re issues in case; correspondence with G. Harper re same; telephone call with G. Harper re redaction to documents and production; review correspondence from G. Harper re same; multiple telephone calls re issues related to redaction to document production; review multiple documents and correspondence re same; review C. Spangler's revisions to mediation position statement; telephone call re Peer Assistance Committee notes, document production, nurse complaints against Dr. Thomas and potential witnesses; review correspondence from G. Harper to K. Wardell re

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Date	Attorney/Other Prof	Hours	Description
			scheduling of call re [REDACTED]; review correspondence from S. Gray and revised proposed confidentiality stipulation; review correspondence re same; telephone call to G. Harper re same; review correspondence re call with K. Wardell; correspondence with K. Wardell re same; review correspondence from G. Harper re scheduling of call with K. Wardell; correspondence with S. Murrell re same; review correspondence from K. Wardell re same
08/19/21	C. Dial	9.30	Redact documents in Relativity for relevancy and privilege; correspondence with G. Harper regarding document redaction status; correspondence with E. Halpern regarding redactions needed and structure for such
08/19/21	E. Halpern	7.80	Continue to redact documents.
08/19/21	G. Harper	5.80	Review redacted documents for production; review correspondence and documents for approval; email with E. Halpern re changes needed for same; [REDACTED]; multiple calls and emails with team re same; review and redact documents; prepare motion for summary judgment issue list; research re same; prepare deposition binders
08/19/21	C. Spangler	0.50	Review and revise draft mediation statement
08/19/21	S. Stodghill	2.60	Conference call with K. Wardell, L. Copeland and G. Harper re multiple issues related to mediation; review multiple correspondence re same; review [REDACTED]; review correspondence from S. Gray re confidentiality stipulation; review [REDACTED]
08/20/21	C. Dial	7.60	Redact documents in Relativity for relevancy and privilege; correspondence with G. Harper

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Date	Attorney/Other Prof	Hours	Description
			regarding document redaction status; correspondence with E. Halpern regarding redactions needed and structure for such; correspondence with C. Myers regarding preparing production set; send finalized production set to opposing counsel
08/20/21	E. Halpern	8.00	Continue to redact documents for production
08/20/21	G. Harper	4.30	Revise confidentiality order; email and call with C. Spangler re same; multiple emails and calls with clients re same; email with opposing counsel re same and status of production; review correspondence from clients re redaction issues; revise same; call with C. Dial re same; finalize and serve executed production agreement; redact documents
08/20/21	S. Stodghill	2.70	Review multiple correspondence from S. Gray and G. Harper re discovery issues in case, confidentiality provision, document production, etc.; telephone call to G. Harper re same; review related correspondence and materials; review correspondence from G. Harper re same; review revision to confidentiality stipulation and related correspondence; review [REDACTED] [REDACTED] review [REDACTED] review correspondence from G. Harper re recently filed document; correspondence with G. Harper re same; review correspondence from G. Harper re same; correspondence re same with G. Harper; review [REDACTED] [REDACTED]
08/21/21	G. Harper	4.60	Redact documents for production
08/21/21	S. Stodghill	1.40	Review correspondence from S. Gray re defendants interrogatory responses; correspondence with G. Harper re same; review

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Date	Attorney/Other Prof	Hours	Description
			correspondence from S. Gray to C. Dial re same; review correspondence from C. Dial to S. Gray re same; review correspondence from S. Gray re document production; telephone call re same; review correspondence from C. Dial to S. Gray re document production; review supplemental document production; review defendants fifth set of document production and correspondence from C. Dial
08/22/21	G. Harper	6.30	<p>[REDACTED]</p> <p>research re same; [REDACTED]</p> <p>[REDACTED] call and email with Mrs. Wardell and Mrs. Copeland re same; draft and edit responses to Shipp mediation form; correspond with clients and team re same; review and redact documents for production; review client documents re event reports for comparators; redact reports</p>
08/22/21	S. Stodghill	1.70	<p>Review [REDACTED]</p> <p>[REDACTED]; review correspondence from C. Spangler re same; correspondence with G. Harper and C. Spangler re revisions to same; review correspondence from S. Gray re confidentiality stipulation; review correspondence and revised mediation position statement from G. Harper;</p> <p>[REDACTED]</p>
08/23/21	C. Dial	0.60	Correspondence with G. Harper and C. Myers regarding production of remaining redacted documents; review production set; send production set and password to opposing counsel
08/23/21	G. Harper	3.40	Call with C. Dial re document production status and strategy; correspond with opposing counsel re same; review and respond to correspondence from opposing counsel re need to supplement interrogatories; revise interrogatories; call with C.

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Date	Attorney/Other Prof	Hours	Description
			Dial re issues with interrogatories; call with S. Stodghill re discovery status and strategy for same; finalize amended interrogatories.
08/23/21	C. Spangler	1.30	Communications with opposing counsel re plaintiff's deposition (.10); communications with G. Harper re discovery (.60); prepare for mediation (.50)
08/23/21	S. Stodghill	4.70	Review correspondence from C. Spangler to S. Gray re amended interrogatory responses and scheduling of Dr. Thomas deposition; correspondence with C. Spangler and S. Gray re scheduling of Dr. Thomas deposition; review correspondence from S. Gray re supplemental production of documents in case; review Dr. Thomas additional documents; review correspondence from S. Gray to C. Spangler re scheduling of deposition of Dr. Thomas; review correspondence re same with WS team; review correspondence from C. Spangler re scheduling deposition of Dr. Thomas; correspondence with C. Spangler re same; telephone call with G. Harper in preparation for deposition of Dr. Thomas and for mediation; review correspondence from K. Wardell re mediation; review correspondence from G. Harper re same; review correspondence from C. Spangler re scheduling deposition of Dr. Thomas; review correspondence from C. Spangler to S. Gray re scheduling of Dr. Thomas deposition; review correspondence from C. Dial to S. Gray re defendants sixth set of document production and related discovery issues; review correspondence from C. Dial to opposing counsel re sixth set of document production; review correspondence from G. Harper to S. Gray re supplemental interrogatories produced by defendants; review correspondence from S. Gray to G. Harper re supplemental document production; review correspondence from Shipp mediation re confidentiality stipulation; review correspondence from Shipp mediation to S. Gray re confidentiality

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Date	Attorney/Other Prof	Hours	Description
			<p>stipulation; [REDACTED] [REDACTED]; telephone call with G. Harper re expert opinions and [REDACTED] [REDACTED]; review correspondence re same from G. Harper; telephone call re Peer Review Committee documents and task list issues; telephone call re strategy for mediation; review [REDACTED] [REDACTED]; review second amended interrogatories and related correspondence from G. Harper to S. Gray</p>
08/24/21	C. Dial	1.30	Call with G. Harper regarding mediation; research federal rules on limits for depositions; locate insurance agreement and send to M. Gaddis for review
08/24/21	M. Gaddis	3.50	Review and analyze insurance policy provisions; research and review case law on denial of coverage for breaches of policy provisions and materiality of same; prepare memo to team re same
08/24/21	G. Harper	4.60	<p>Review and respond to multiple emails from opposing counsel re discovery issues; multiple [REDACTED] [REDACTED]; review correspondence from opposing counsel re error in damages report; call with A. Aurisch re same; call with clients re same; review additional document requests; call with team re same and things to do; email client re same; review and respond to correspondence from opposing counsel re depositions; call with clients re deposition issues and scheduling; research re claims; call re mediation; multiple emails with clients re deposition issues and strategy for same; call with S. Stodghill re same</p>
08/24/21	C. Spangler	1.30	Communications re depositions (.20); prepare for mediation (1.10)
08/24/21	S. Stodghill	2.80	Review correspondence from G. Harper to J. Shipp

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Date	Attorney/Other Prof	Hours	Description
			re [REDACTED]; review correspondence from G. Harper re Hediation position statement; review correspondence from G. Harper to S. Gray re second amended interrogatory response and related issues; review [REDACTED]; review correspondence from S. Gray re second amended interrogatory responses and related discovery issues; telephone call to G. harper in preparation for mediation, response to S. Gray issues with defendants' second amended interrogatory responses, scheduling of depositions and expert issues; review correspondence from S. Gray re multiple discovery issues; review correspondence from G. Harper to S. Gray re same; review correspondence from G. Harper to S. Gray re discovery issues in case; telephone call with G. Harper re issues related to mediation; review multiple correspondence re potential depositions by plaintiffs in case; correspondence with M. Gaddis and G. Harper re legal research in case; review correspondence from S. Gray re request for multiple depositions: review [REDACTED]; [REDACTED]; correspondence with M. Gaddis re same
08/25/21	C. Dial	5.40	Participate in mediation; meeting with G. Harper regarding next steps in addressing discovery deficiencies
08/25/21	G. Harper	6.80	Prepare for mediation; research re claims re same; call with C. Dial re same and strategy; call with S. Stodghill re same: [REDACTED]; attend mediation; multiple calls and emails with K. Bierney re status and strategy
08/25/21	C. Spangler	7.20	Participate in mediation
08/25/21	S. Stodghill	3.40	Review correspondence from Shipp mediation re

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Date	Attorney/Other Prof	Hours	Description
			<p>confidentiality stipulation; telephone call to G. Harper re preparation for mediation; review correspondence from Shipp mediation re Zoom invitation; review correspondence from M. Gaddis re legal research issues in preparation for mediation; telephone call to G. harper re issues related to mediation; review correspondence from G. Harper re mediation; correspondence with G. Harper re status of mediation; review correspondence from G. Harper re status of mediation; telephone call to G. Harper re status of mediation; review correspondence from G. Harper re same; correspondence with G. Harper re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; correspondence with G. Harper re same; review settlement offer and related correspondence from G. Harper; correspondence with G. Harper re same; review correspondence from C. Dial re status of mediation; correspondence with C. Dial re same; telephone call to G. Harper re counter offer to plaintiff; review correspondence from G. Harper re same; correspondence with G. Ahrper re same; review correspondence from G. harper re same; review correspondence from C. Dial re same; correspondence with C. Dial re same; telephone call with G. Harper re status of offer and settlement strategy; review correspondence from G. Harper re counter offer; correspondence with G. Harper re same; review correspondence from C. Dial re counter offer by plaintiffs; review correspondence from G. Harper re same; correspondence with C. Dial re same; correspondence with G. Harper re same; telephone call to G. Harper re same; review multiple correspondence from C. Dial re same</p>
08/26/21	C. Dial	2.20	Calendar response deadlines and reminders for responses to plaintiff's second discovery requests; review plaintiff's discovery requests and summarize; send summaries to G. Harper and S. Stodghill for review

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Date	Attorney/Other Prof	Hours	Description
08/26/21	M. Gaddis	0.20	Call G. Harper to discuss status of case following mediation
08/26/21	G. Harper	4.20	Attention to scheduling depositions; multiple emails and calls with opposing counsel re same; multiple emails and calls with clients re same; email [REDACTED] [REDACTED]; review new discovery requests from Plaintiff; multiple emails with opposing counsel re Drs. Honeycutt and Mayfield; call with clients re same; call with C. Dial re new discovery; review summary of same; call with clients re same and documents to be gathered; begin to assemble chart re Joint Credentials Committee decisions; call to clients re same; continue document review
08/26/21	S. Stodghill	3.30	Telephone call [REDACTED] [REDACTED], scheduling of Dr. Thomas deposition and preparation for same, scheduling of Cook deposition and logistics re same, discovery requests and expert issues in case; review correspondence from G. Harper re scheduling of Dr. Thomas deposition; review correspondence from K. Wardell re same and scheduling of Cook deposition; review correspondence from G. Harper to K. Wardell re scheduling of Cook's deposition; review correspondence from C. Spangler to S. Gray re scheduling of deposition; review correspondence from C. Spangler to S. Gray re scheduling of deposition; review correspondence from S. Gray re availability to schedule Dr. Thomas deposition; review plaintiff's request for production of documents; review correspondence from S. Gray re same; review correspondence from C. Dial re issues in case; review related correspondence from C. Dial; review Thomas interview issues, master list and notes from multiple interviews; review correspondence from C. Dial re issues in case; review correspondence from C. Dial re discovery

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Date	Attorney/Other Prof	Hours	Description
			deadlines in case; review correspondence from C. Dial; review memorandum from C. Dial re analysis of discovery requests from Plaintiff's counsel; correspondence with C. Dial re same; review correspondence from G. Harper re plaintiff's discovery requests; review correspondence from L. Copeland re same; review correspondence from G. Harper re same; telephone call with G. Harper re same
08/27/21	C. Dial	0.70	Review plaintiff's interrogatory responses to identify deficiencies; summarize outstanding issues and send to G. Harper and S. Stodghill for review
08/27/21	G. Harper	4.40	Review and respond to client correspondence re additional discovery from Plaintiff; call with Mrs. Copeland re same; call with S. Stodghill re same; multiple emails and calls with opposing counsel re depositions and remaining discovery; multiple calls and emails with C. Spangler re strategy for depositions and discovery; multiple calls and emails with clients re same; review new set of discovery served by plaintiff; call with S. Stodghill re Plaintiff's discovery demands; call with C. Spangler re same; call with clients re same and documents needed; review client documents re production issues
08/27/21	C. Spangler	0.30	Communications re depositions
08/27/21	S. Stodghill	3.50	Telephone call with G. Harper re scheduling of multiple depositions and responses to recent discovery requests; review multiple correspondence re same; correspondence re same; review correspondence from S. Gray re scheduling 12 depositions of Cook Children's deponents; review correspondence from S. Gray re request for additional depositions; telephone call to G. Harper re same; review correspondence from C. Spangler re same; review correspondence from S. Gray re deposition scheduling; review correspondence

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Date	Attorney/Other Prof	Hours	Description
			from C. Spangler re same; review correspondence from S. Gray re scheduling of depositions of B. Schmidt and J. Gallagher; review related correspondence; review third set of requests for production and related correspondence from S. Gray; review related correspondence from S. Gray; review attachments to same; review multiple discovery requests and related correspondence; review deposition notice for Dr. Thomas and related correspondence from C. Spangler; review witness interview by Cook Children's Hospital and related correspondence; review multiple correspondence from S. Gray re additional discovery responses and depositions; review correspondence from G. Harper re additional discovery requests and depositions; telephone call to G. Harper re same; review multiple correspondence from G. Harper re scheduling of depositions; telephone call re same; review multiple correspondence re same
08/30/21	C. Dial	4.30	Call with G. Harper regarding need to collect documents to respond to additional discovery requests; summarize plaintiff's additional discovery requests and send to team for review; calendar deadlines for discovery responses; review plaintiff's discovery responses and summarize deficiencies for G. Harper and S. Stodghill
08/30/21	G. Harper	5.30	[REDACTED]; prepare documents for production; redact same; prepare materials for depositions and discovery; review [REDACTED]
08/30/21	C. Spangler	0.50	Analysis and communications re discovery issues
08/30/21	S. Stodghill	4.30	[REDACTED]; telephone call to G. Harper re multiple issues in case, scheduling of depositions, both offensive and defensive, request for

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Date	Attorney/Other Prof	Hours	Description
			<p>additional depositions by plaintiff's counsel and service of written discovery; correspondence with G. Harper re multiple issues in case; review correspondence from G. Harper to S. Gray re request for additional depositions; review correspondence from S. Gray re same; telephone call to G. Harper re request for additional depositions; review correspondence from G. Harper to S. Gray re scheduling of call; review multiple correspondence from S. Gray re additional discovery requests; review multiple correspondence with G. Harper re scheduling of depositions of Cook employees; review materials re preparation for same; review correspondence from G. Harper to S. Gray re availability of potential deponents; [REDACTED]</p> <p>[REDACTED]; review correspondence from C. Dial re deficiencies in Thomas document production; correspondence with C. Dial and G. Harper re same and potential motion to compel; further review of Thomas interview; review correspondence from S. Gray re CHUBB representative; telephone call to G. Harper re issues in case; telephone call with G. Harper re multiple defense issues in case for individual defendants; review correspondence from C. Dial re response to plaintiff's third request for production; review related correspondence from C. Dial; review multiple discovery requests from Dr. Thomas; review local rule re same; meeting with G. Harper re same and additional depositions; telephone call re potential depositions; review correspondence and materials from C. Dial re discovery dispute; correspondence with C. Dial</p>
08/31/21	C. Dial	1.60	<p>Call with G. Harper regarding need for discovery deficiency letter and additional discovery requests; research standard for additional depositions; calendar reminders for deadline to respond to plaintiff's discovery requests</p>

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Date	Attorney/Other Prof	Hours	Description
08/31/21	G. Harper	4.80	Review additional discovery served by plaintiff; multiple calls and emails with team re same; [REDACTED] review email from opposing counsel re request for additional depositions; respond to same; email and call with C. Spangler re litigation strategy, depositions, and scheduling issues; call with S. Stodghill re deposition issues and case strategy; [REDACTED]
08/31/21	S. Stodghill	2.90	Review memorandum from C. Dial re new request for production served by Dr. Thomas; review correspondence from C. Dial re duplicate requests for production in most recent requests by plaintiff's counsel; review plaintiff's fourth set of requests for production and related correspondence from S. Gray; telephone call from G. Harper re Thomas request for additional depositions; telephone call to G. Harper re same and legal research related to 10 deposition Federal Rule; review correspondence from S. Gray re discovery issues in case; review correspondence from G. Harper re same; review correspondence from K. Wardell re potential dates for depositions; review correspondence from S. Gray re list and potential date for Cook Children's depositions; review correspondence from G. Harper re same; correspondence re potential deposition dates and availability; correspondence with G. Harper re deposition of R. Merrill and J. Gallagher; review correspondence re scheduling of depositions of J. Gallagher and R. Merrill; correspondence re same; review correspondence from C. Dial re responses to plaintiff's fourth request for production; review related correspondence from C. Dial; review correspondence from C. Dial to S. Gray re discovery issues in case

Total Hours 461.20

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Sub-Total Legal Services	\$434,043.00
Less 10% Discount	(43,404.30)
Total for Legal Services	\$390,638.70

Timekeeper Summary

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	70.50	1,245.00	87,772.50
C. Spangler	21.20	965.00	20,458.00
G. Harper	176.40	1,085.00	191,394.00
M. Gaddis	38.70	965.00	37,345.50
C. Dial	105.20	610.00	64,172.00
E. Halpern	27.80	610.00	16,958.00
A. Aurisch	21.40	745.00	15,943.00
Total Attorney/Other Prof	461.20		434,043.00

Disbursements & Other Charges

Description	Amount
Electronic Discovery Services	6,819.40
Expert, Consultation, and Evaluation Fees	8,551.25

Total Disbursements & Other Charges	\$15,370.65
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Total Due This Invoice	\$406,009.35
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WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2826783
 Invoice Date 10/26/21
 Client Matter No. 180333.00004

Client Remittance Copy

Total Fees	\$390,638.70
Total Disbursements & Other Charges	15,370.65
Total Due This Invoice	\$406,009.35

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
Via Mail: Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	Via Delivery Service: Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
Karen Wardell
801 Seventh Avenue
Fort Worth, TX 76104

Invoice # 2826783
Invoice Date 10/26/21
Client Matter No. 180333.00004

Remittance Advice

Please include this remittance page with your payment

Total Fees	\$390,638.70
Total Disbursements & Other Charges	15,370.65
Total Due This Invoice	\$406,009.35

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
Via Mail: Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	Via Delivery Service: Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2826788
 Invoice Date 10/26/21
 Client Matter No. 180333.00004

For Legal Services Rendered Through September 30, 2021 In Connection With:

00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
09/01/21	C. Dial	1.40	Review samples of discovery deficiency letters; research [REDACTED] [REDACTED] [REDACTED]
09/01/21	G. Harper	3.30	Review fourth set of document requests to corporate defendants; call with C. Dial re same; review and redact event reports and other materials for production; research re liability issues; work on deposition scheduling; call with clients re case status and strategy; call and email with S. Stodghill re Plaintiff's request for depositions in excess of limit in federal rules; call with C. Dial re same; review memo from C. Dial re [REDACTED] [REDACTED]; call to client re same
09/01/21	C. Spangler	0.80	Analysis and communications re proposed revisions to settlement agreement
09/01/21	S. Stodghill	2.30	Review correspondence from Shipp Mediation; review ADR report from mediation with plaintiff's counsel; meeting with G. Harper re multiple issues related to recent plaintiff's request for production and scheduling of depositions; telephone call to C. Dial re same and analysis of discovery requests and potential objections/responses; telephone call re scheduling of depositions in case for Cook Children's deponents; telephone call re remote preparation for deposition and depositions; review legal research re [REDACTED] [REDACTED]; review materials from C. Dial re same; review

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Date	Attorney/Other Prof	Hours	Description
			correspondence from C. Dial and legal research re [REDACTED]
09/02/21	C. Dial	3.70	Call with G. Harper and client regarding need to collect documents to respond to additional discovery requests; summarize plaintiff's additional discovery requests and send to client for review
09/02/21	G. Harper	2.90	Review and respond to correspondence from opposing counsel re deposition scheduling; multiple calls and emails with clients re same; call with C. Spangler re coverage for same; call with C. Dial re discovery responses and status of document review; prepare for and attend conference call with clients re new discovery requests and documents needed to be gathered to respond to same
09/02/21	S. Stodghill	2.70	Review correspondence from S. Gray re deposition scheduling; telephone call to G. Harper re same; review multiple correspondence re same; review notice from the Court; review ADR report letter summary from J. Shipp; review correspondence re deposition of T. Wallace; review notice of intent to serve subpoena; review subpoena to T. Wallace; review correspondence and analysis of legal research [REDACTED] [REDACTED]; correspondence with C. Dial and G. Harper re same; telephone call to G. Harper re same
09/03/21	C. Dial	0.30	Correspondence with Ms. Nettle regarding documents sought by plaintiff in new requests for production; begin outlining discovery deficiency letter to opposing counsel
09/03/21	G. Harper	3.40	Review and respond to multiple emails from Ms. Gray re depositions; call with Mrs. Wardell re same; call and email with Ms. Wallace re subpoena and deposition; forward materials

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Date	Attorney/Other Prof	Hours	Description
			received from Plaintiff re same; call with clients re same; multiple emails with Mrs. Wardell re depositions and strategy for same; review and respond to correspondence from Ms. Maile re depositions and issues with preparing witnesses for same; review and respond to multiple emails from opposing counsel re issues with deposition of Dr. Perez; review and respond to email from Ms. Wallace re case issues and subpoena duces tecum; correspond with C. Spangler re strategy issues with discovery; review and respond to email from Ms. Hopkins re deposition on written questions to Drs. Honeycutt and Mayfield; call with client re same
09/03/21	C. Spangler	2.20	Continue preparing for plaintiff's deposition
09/03/21	S. Stodghill	2.20	Review multiple correspondence re scheduling depositions for Cook Childrens' employees; review correspondence from G. Harper re availability for same; telephone call with G. Harper re same and request for additional depositions; review correspondence from S. Gray re discovery issues and deposition scheduling in case; review discovery subpoena and related correspondence from G. Harper to clients; review correspondence from G. Harper to S. Gray re scheduling of depositions during pandemic; correspondence with G. Harper re deposition scheduling issues and potential request for extension; review correspondence from opposing counsel re deposition discovery; review correspondence from G. Harper re deposition of Dr. Perez; review correspondence from S. Gray re same; review correspondence from G. Harper re same
09/07/21	G. Harper	1.90	Call with S. Stodghill re depositions and discovery issues and strategy for same; email with C. Dial re status of discovery responses; multiple emails to C. Dial and S. Stodghill re discovery status and things to do; review event reports

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09/07/21	S. Stodghill	2.20	Telephone call to G. Harper re scheduling of multiple depositions in case, discovery issues, responses to document requests and other discovery issues in case; correspondence with G. Harper and C. Dial re scheduling of depositions, responses to document requests and other discovery issues in case; telephone call with G. Harper re scheduling of deposition of Cook Childrens' witnesses and related discovery issues; telephone call with C. Dial re responses to recent discovery requests; correspondence with C. Dial re same; review materials re response to recent requests for production
09/08/21	C. Dial	5.00	Draft discovery deficiency letter to opposing counsel; review federal rules of civil procedure and case law [REDACTED]; call with G. Harper regarding plan of action for upcoming depositions; calendar scheduled depositions
09/08/21	G. Harper	3.20	Call with clients re event reports, maintenance of same, and discovery issues; ; call with C. Dial re deposition issues and things to do to prepare for same; call with S. Stodghill re multiple discovery issues and strategy for same; review and respond to multiple team emails re Thomas deposition; work on scheduling deposition; review documents produced re witness preparation issues; research re comparators
09/08/21	S. Stodghill	1.90	Telephone call with G. Harper re scheduling depositions, document production, related discovery disputes and preparation for Dr. Thomas deposition; correspondence with C. Spangler and G. harper re preparation for deposition of Dr. Thomas; correspondence with C. Dial and G. Harper re deposition preparation for Cook Childrens deponents; review Dr. Thomas first supplemental initial disclosures and related correspondence; review correspondence from C. Dial re analysis of Dr. Thomas supplemental initial

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Date	Attorney/Other Prof	Hours	Description
			disclosures; review multiple deposition notices and related correspondence from Dr. Thomas
09/09/21	C. Dial	4.60	Draft discovery deficiency letter to opposing counsel; review federal rules of civil procedure and case law [REDACTED]
09/09/21	G. Harper	5.20	Email with S. Stodghill re deposition coverage issues; review and respond to correspondence from Ms. Gray re depositions on written questions and service of same; review and respond to email from Ms. Hopkins re deposition scheduling issues and impact on discovery deadline; review Plaintiff's First Amended Disclosures, call with S. Stodghill re same and things to do; call with C. Dial re new persons with knowledge; multiple calls and emails with clients re same and deposition issues; email with Ms. Maile re witness availability; review deposition notices from Plaintiff and call with Mrs. Wardell re same; multiple calls and emails with Ms. Wallace re deposition issues; multiple emails with Ms. Maile re depositions on written questions; review certified responses of Dr. Mayfield to same; multiple emails with opposing counsel re deposition issues; multiple emails with opposing counsel re deposition scheduling and issues with same; call and email with C. Spangler re upcoming deposition of Plaintiff; prepare for depositions
09/09/21	C. Spangler	0.20	Communications re Plaintiff's deposition
09/09/21	S. Stodghill	2.60	Meeting with G. Harper re scheduling depositions of Cook Childrens corporate representative witnesses, preparation for same, deposition of Dr. Thomas, document production issues and other discovery disputes; review multiple correspondence re same; review correspondence re deposition of J. Gallagher; review correspondence re deposition of Dr. Perez; review correspondence re deposition of Dr. Schmidt; review correspondence from G. Harper to S. Gray re

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Date	Attorney/Other Prof	Hours	Description
			scheduling depositions; review multiple deposition notices and correspondence to clients from G. Harper; meeting with G. Harper re deposition for R. Merrill and J. Gallagher; review correspondence from G. Harper to K. Wardell re scheduling depositions; review correspondence re scheduling of depositions; review correspondence to clients from G. Harper re supplemental disclosures from Dr. Thomas; review correspondence with opposing counsel from G. Harper re scheduling of deposition; telephone call re scheduling of deposition preparation; review correspondence from G. Harper re scheduling depositions of R. Merrill and J. Gallagher
09/10/21	C. Dial	6.40	Draft discovery deficiency letter to opposing counsel; review federal rules of civil procedure and case law [REDACTED]; review plaintiff's responses [REDACTED] [REDACTED]
09/10/21	G. Harper	4.40	Multiple emails with Ms. Maile re deposition of Mr. Merrill; email with S. Stodghill re same; call with C. Dial re discovery issues and things needed for deposition of Plaintiff; email with C. Spangle re issues for Plaintiff's deposition; multiple emails with opposing counsel re deposition scheduling issues; review and respond to correspondence from opposing counsel re issues with deposition of Ms. Wallace and subpoena duces tecum re same; multiple calls and emails with S. Stodghill re discovery issues and deposition strategy
09/10/21	S. Stodghill	2.30	Review correspondence from G. Harper to S. Gray re scheduling of depositions; telephone call with G. Harper; review response to requests for production; review correspondence from C. Dial re same; review correspondence from C. Dial re same; review correspondence from S. Gray re same; review correspondence from S. Gray re document production by T. Wallace; telephone call to G. Harper re multiple discovery issues; review

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Date	Attorney/Other Prof	Hours	Description
			correspondence from G. Harper re deposition of Dr. Thomas from S. Gray; telephone call with G. Harper re preparation for depositions; review correspondence from G. Harper to S. Gray re T. Wallace document issues; review correspondence from S. Gray re scheduling date for Dr. Thomas deposition and deposition of T. Wallace
09/13/21	C. Dial	5.30	Draft and revise discovery deficiency letter to opposing counsel; send draft to G. Harper for review; draft objections and responses to plaintiff's second set of requests for production
09/13/21	G. Harper	2.80	Call to C. Dial re issues with Plaintiff's discovery and things to do re same; email to opposing counsel re deposition issues and document concerns; multiple emails with S. Stodghill re discovery strategy and things to do re same; call with S. Stodghill re depositions; prepare for Thomas deposition; research re individual liability
09/13/21	C. Spangler	0.30	Communications re plaintiff's deposition
09/13/21	S. Stodghill	2.10	Review correspondence from G. Harper re discovery issues, document production issues and deposition scheduling and preparation; correspondence with G. Harper re same; telephone call to G. Harper re multiple discovery issues, scheduling of depositions, preparation for defense of depositions and the deposition of Dr. Thomas; review correspondence from S. Gray re scheduling of depositions; telephone call to G. Harper re discovery issues in case; review materials in preparation for depositions; review multiple correspondence in case
09/14/21	C. Dial	6.80	Call with G. Harper regarding deposition scheduling; calendar deposition dates and response deadlines for new discovery requests; draft discovery responses to plaintiff's second set of requests for production; call with C. Spangler and G. Harper regarding needed tasks to prepare for

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			plaintiff's deposition
09/14/21	G. Harper	3.90	Review and respond to inquiry from opposing counsel re deposition scheduling; call with C. Dial re deposition preparation issues; review deposition notices; email with C. Dial re issues with Nelson deposition; prepare for and attend call with team and clients re deposition strategy; call with team re preparation for Thomas deposition; call with S. Stodghill re deposition issues and tasks for deposition of Plaintiff; review event reports and prepare materials for discovery; review redactions; prepare for upcoming depositions; select exhibits for same
09/14/21	C. Spangler	4.20	Prepare for plaintiff's deposition; review and analyze new discovery responses and requests from plaintiff; review and comment upon discovery deficiency letter
09/14/21	S. Stodghill	3.80	Review correspondence from opposing counsel re defendants second interrogatory responses; review correspondence from C. Dial re deadlines in case; review correspondence from C. Dial re deposition of Dr. Thomas; review correspondence from C. Dial re deposition of L. Reaves; review correspondence from opposing counsel re depositions; review multiple deposition notices sand related correspondence; review correspondence from G. Harper re scheduling of depositions; review correspondence from S. Gray re deposition scheduling; telephone call with G. Harper re same; review correspondence from opposing counsel re Dr. Thomas second supplemental disclosure and document production; review correspondence re same; review correspondence from C. Dial re 5th and 6th requests for production and 2nd interrogatory responses; review correspondence re same from C. Dial; review multiple discovery responses and new discovery requests from plaintiffs' counsel; review multiple discovery requests from plaintiffs' counsel

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			and related correspondence; review correspondence and discovery requests from opposing counsel; telephone call re same
09/15/21	C. Dial	9.10	Summarize new discovery requests, supplemental disclosures and expert report from plaintiff and send summary to G. Harper, C. Spangler, and S. Stodghill for review; call with G. Harper regarding documents to be gathered for plaintiff's deposition; review plaintiff's second production for relevant documents [REDACTED]
09/15/21	G. Harper	4.20	Call with C. Dial re documents needed for definition of Plaintiff and strategy for same; review plaintiff's document production re same; call with C. Dial re multiple discovery issues and case strategy; email with opposing counsel re Wallace documents and lack of legal representation of Ms. Wallace; call with S. Stodghill re multiple deposition issues; prepare for meeting with Ms. Schmidt to prepare for deposition; review documents and research re same
09/15/21	C. Spangler	1.00	Continue preparing for Plaintiff's deposition (.50); review and analysis of additional communications from Plaintiff's attorney (.50)
09/15/21	S. Stodghill	3.60	Prepare for depositions; review multiple recent discovery requests by Dr. Thomas; review correspondence from opposing counsel re same; telephone call to C. Dial re response to same; telephone call to G. Harper re scheduling of deposition; review multiple correspondence and discovery request in case; review correspondence from S. Gray re issues related to deposition of Dr. Thomas; review correspondence from S. Gray re scheduling of expert deposition; correspondence re same; telephone call with G. Harper re same; review summary of new discovery requests and related correspondence from C. Dial; review plaintiffs' second set of interrogatories, plaintiffs'

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			fifth and sixth set of requests for production, plaintiffs' second supplemental initial disclosures and expert supplemental damages assessment; telephone call to C. Dial re responses to same; correspondence with C. Dial re same; correspondence with C. Spangler re preparation for Dr. Thomas deposition; review correspondence from C. Spangler re preparation for deposition of Dr. Thomas; correspondence with C. Spangler re same
09/16/21	C. Dial	7.80	Send summary of new discovery requests to Ms. Wardell and Ms. Nettle; review plaintiff's second production for relevant documents [REDACTED]; call with G. Harper regarding deposition prep with Ms. Schmidt; deposition preparation meeting with G. Harper and Ms. Schmidt; call with C. Spangler and G. Harper regarding deposition scheduling
09/16/21	G. Harper	7.70	Call with Mrs. Wardell re discovery strategy and issues with upcoming depositions; review Plaintiff's 5th and 6th set of requests for production of documents; review Plaintiff's second set of interrogatories; call with clients re same and strategy for responses; review and respond to email from C. Spangler re issues re depositions and things to do re same; prepare memo re discovery plan; review supplemental damage report of Mr. Roney; email with A. Aurisch re same; call with C. Dial re deposition prep issues and materials needed for same; prepare for meeting with Mrs. Schmidt; review plaintiff's supplement initial disclosures; call and email clients re same; meet with Mrs. Schmidt to prepare for her deposition; review email from C. Dial summarizing newest discovery requests; email C. Dial re same; call with C. Dial re issues raising by opposing counsel re documents; review and respond to same; research re discovery and responsive materials; call with C. Dial re same; call with S. Stodghill re issues with Plaintiff's

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Date	Attorney/Other Prof	Hours	Description
			discovery responses; call with C. Dial re same; review and edit letter to opposing counsel re deficiencies in Plaintiff's discovery responses; finalize and serve same; call with S. Stodghill re deposition status and discovery issues
09/16/21	C. Spangler	1.30	Communications re plaintiff's deposition and related discovery issues
09/16/21	S. Stodghill	3.20	Review multiple correspondence re preparation for depositions; telephone all with G. Harper re preparation for Cook Childrens' defensive depositions and deposition of Dr. Thomas; review correspondence from C. Spangler re discovery request responses; review correspondence from C. Dial re same; review summary of new discovery requests; review Dr. Thomas second supplemental initial disclosures and related correspondence; review correspondence from G. Harper re same; review multiple discovery requests from Dr. Thomas; review correspondence re same; review correspondence from opposing counsel re discovery disputes; review correspondence from G. Harper re discovery disputes; telephone call re expert designations with G. Harper; review correspondence from C. Dial re B. Schmidt preparation for deposition; review correspondence from C. Spangler re discovery disputes; review correspondence from C. Spangler to S. Gray re discovery disputes; review correspondence from C. Spangler re scheduling of depositions and discovery agreement; review correspondence from C. Dial re same
09/17/21	C. Dial	3.40	Review plaintiff's second production for relevant documents to damages claim and save to folder; review correspondence between C. Spangler and Ms. Gray regarding scheduling of depositions
09/17/21	G. Harper	3.90	Gathering documents for upcoming depositions; research re same; multiple emails and calls with opposing counsel re depositions and issues re

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Date	Attorney/Other Prof	Hours	Description
			same; review documents re redaction issues
09/17/21	C. Spangler	0.80	Communications re deposition schedule
09/17/21	S. Stodghill	3.70	Review correspondence from S. Gray re documents related to Skilled Wound Care; review correspondence from S. Gray to G. Harper re depositions, stipulation to admission of documents and M. Perez safety issues; review correspondence from G. Harper to S. Gray re discovery response; review related correspondence from G. Harper; review correspondence from G. Harper to S. Gray re Wallace deposition and Perez deposition; telephone call with G. Harper re preparation for depositions; review correspondence from G. Harper to S. Gray re multi day depositions in case; review correspondence from S. Gray re submission to tape recorded depositions; review correspondence from S. Gray re scheduling of depositions; review correspondence from S. Gray to C. Spangler re scheduling of deposition; review correspondence from s. Gray to C. Spangler re scheduling of deposition; review correspondence from C. Spangler re same; review correspondence from S. gray to C. Spangler re scheduling of depositions; telephone call re same; review correspondence from C. Spangler to S. Gray re scheduling of deposition of Dr. Thomas; review correspondence from S. Gray to C. Spangler re scheduling of deposition of Dr. Thomas; review correspondence from C. Hopkins re comparator data; review related correspondence; prepare for depositions
09/18/21	G. Harper	1.60	Review multiple emails from C. SPangler to Mrs. Gray re numerous deposition issues; multiple emails to C. Spangler re same and strategy for same; call with C. Spangler re issues with S. Gray and deposition of Plaintiff; call with S. Stodghill re same; correspond and call with clients re same and deposition discovery issues

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Date	Attorney/Other Prof	Hours	Description
09/18/21	C. Spangler	0.30	Communications re plaintiff's deposition
09/18/21	S. Stodghill	0.80	Review correspondence from S. Gray re scheduling of depositions of Cook witnesses; review correspondence from C. Spangler re scheduling of deposition of Dr. Thomas; telephone call with G Harper re same; review correspondence from S. Gray to C. Spangler re scheduling of deposition of Dr. Thomas; review multiple correspondence re same
09/19/21	C. Dial	0.30	Call and correspondence with G. Harper regarding scheduling Mr. Gallagher's deposition preparation session; schedule video conference for deposition preparation
09/19/21	G. Harper	0.30	Call and email with C. Dial re preparation for Gallagher deposition
09/20/21	C. Dial	8.30	Call with G. Harper regarding deposition prep with Mr. Gallagher; deposition preparation meeting with G. Harper and Mr. Gallagher; draft discovery responses for Cook entities and send to G. Harper for review; begin drafting discovery responses for individual defendants
09/20/21	G. Harper	6.90	Prepare for meeting with Mr. Gallagher; call with C. Dial re same and things to do; call with S. Stodghill re Gallagher deposition and various discovery disputes; correspond with C. Spangler re upcoming depositions; meet with Mr. Gallagher to prepare for his deposition; multiple calls with clients re witness issues in effort to schedule remaining depositions; multiple calls with S. Stodghill re issues with Plaintiff's deposition and outstanding discovery; meet with S. Stodghill re case strategy and outstanding discovery issues
09/20/21	C. Spangler	0.30	Communications re deposition schedule

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Date	Attorney/Other Prof	Hours	Description
09/20/21	S. Stodghill	3.30	Telephone call to G. Harper re preparation for deposition of J. Gallagher, response to discovery disputes with S. Gray and scheduling of Dr. Thomas deposition; telephone call to G. Harper re same; telephone call from G. Harper re same; review correspondence from G. Harper re same; telephone call to C. Dial re multiple recent discovery requests by plaintiff's counsel, deposition preparation, discovery disputes and other issues in case; meeting with G. Harper in preparation for depositions and with regard to scheduling issues in case; review multiple materials and correspondence re preparation for Cook Childrens' depositions and Dr. Thomas deposition; meeting with G. Harper re preparation of J. Gallagher and other discovery issues in case; review correspondence from S. Gray re deposition scheduling of Cook Childrens' witnesses and Dr. Thomas; review correspondence from C. Spangler to S. Gray re scheduling of depositions; review correspondence from S. Gray to C. Spangler re scheduling of deposition; review correspondence from C. Spangler to S. Gray re scheduling of depositions; telephone call with G. Harper re expert issues in case
09/21/21	C. Dial	6.30	Call with G. Harper and S. Stodghill regarding need for updated task list; update task list to include discovery response deadlines and circulate to team; draft discovery responses for individual defendants; review documents produced by plaintiff
09/21/21	G. Harper	4.40	Call with C. Dial re status of document production and issues with Wallace production; gather materials and forward same to C. Dial; review email from opposing counsel re issues with document redaction and errors re same; call and email with C. Dial re same; email with opposing counsel re deposition schedule and proposal for same; review and respond to correspondence from S. Stodghill re deposition limits; call with S.

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Date	Attorney/Other Prof	Hours	Description
			Stodghill re task list; call with team re same and revisions needed to same; multiple calls and emails with S. Stodghill re various discovery strategy issues and resolution of outstanding disputes with opposing counsel
09/21/21	C. Spangler	2.20	Review and analyze responses to discovery requests, subpoenas
09/21/21	S. Stodghill	3.80	Telephone call to G. Harper re scheduling depositions, preparation for depositions, Dr. Thomas deposition, discovery disputes and expert witness issues; telephone call from G. Harper re same; telephone call to G. Harper re same; review materials re objections and responses to multiple discovery requests recently served by plaintiff's counsel; conference call with G. Harper and C. Dial re same and calendaring of depositions; review materials re J. Gallagher and B. Schmidt depositions; review draft response to request to Cook defendants; review correspondence from C. Spangler re discovery issues; review respondent's objections and responses to Williams deposition notice and related correspondence from G. Harper; review discovery response task list and related correspondence from C. Dial; correspondence with C. Dial re same; review correspondence from G. Harper to S. Gray re scheduling of multiple depositions of Cook witnesses; review correspondence from S. Gray re J. Iglesias and R. Rhodes; correspondence with G. Harper and C. Dial re same; review correspondence from S. Gray re discovery disputes related to multiple documents produced; review correspondence from G. Harper re additional deposition requests; correspondence with G. Harper re same; telephone call to G. Harper re same; review correspondence from S. Gray re depositions of J. Kimmey and B. Flores; review updated discovery task list with deadlines and related correspondence from C. Dial; review Thomas fourth set of production; review related correspondence review

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Date	Attorney/Other Prof	Hours	Description
			correspondence from S. Gray re same; review correspondence re document production; review correspondence from S. Gray re fourth set of document production; review correspondence from C. Dial re discovery deadlines; conference call re discovery issues in case; review correspondence from S. Gray re deposition of T. Roney; review correspondence from S. Gray to G. Harper re discovery issues in case; review correspondence from C. Dial re document issues in case
09/22/21	C. Dial	7.80	Call with G. Harper regarding deposition prep session with Ms. Schmidt; draft discovery responses for individual defendants and send to G. Harper for review; review correspondence from opposing counsel regarding redaction corrections and discuss with G. Harper
09/22/21	G. Harper	7.70	Review and respond to opposing counsel re Roney deposition; multiple calls and emails with client re discovery issues; review correspondence between opposing counsel and Ms. Wallace re deposition issues; email Ms. Wallace re counsel for her deposition; review completed depositions on written questions; email with opposing counsel re same; email with Ms. Maile re witness availability for depositions and preparation; draft and edit deposition charts and calendar for same; research re same; multiple emails and calls with clients re same; email with opposing counsel re same; multiple calls and emails with Ms. Dial re documents responsive to and responses to plaintiff's document requests to individual defendants; multiple emails and calls with clients re deposition issues; multiple emails to opposing counsel re same; gather prepare for meeting with Ms. Schmidt re upcoming depositions; research re [REDACTED]; multiple calls and emails with S. Stodghill re outstanding case issues and strategy for same
09/22/21	C. Spangler	1.30	Communications re discovery, deposition issues

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09/22/21	S. Stodghill	3.70	Review correspondence from S. Gray re depositions of J. Iglesias and R. Rhodes; review correspondence from G. Harper re deposition of R. Merrill and L. Reaves; review correspondence from S. Gray re deposition of R. Merrill and L. Reaves; review correspondence from G. Harper to S. Gray re depositions of R. Merrill and L. Reaves; review correspondence from S. Gray re multiple discovery issues in case; review correspondence from G. Harper to S. Gray re scheduling of depositions; review correspondence from G. Harper to S. Gray re depositions of J. Iglesias, L. Rhodes and B. Nelson; review correspondence from G. Harper re deposition of Dr. Thomas; review correspondence from S. Gray re deposition of Dr. Thomas and related logistics; review multiple correspondence re scheduling of depositions; telephone call to G. Harper re multiple depositions and discovery issues in case; review correspondence from G. Harper re deposition scheduling and deposition preparation scheduling; review correspondence from G. Harper and outline of questions for Dr. Mayfield and Dr. Honeycutt; review correspondence from G. Harper to S. Gray re scheduling dates of multiple depositions; review materials from Thomas fourth set of document production and related correspondence; review correspondence from C. Dial re deposition preparation; review correspondence from C. Dial re deposition of Dr. Beam; review correspondence from C. Dial re deposition of T. Wallace; review correspondence from B. Hunter re deposition of Dr. Thomas; correspondence with B. Hunter re same; review correspondence from G. Harper re deposition of Dr. Thomas; review correspondence from G. Harper re deposition of J. Gallagher; correspondence with G. harper re same; review correspondence re deposition scheduling in case; review correspondence from opposing counsel re amended deposition notices; review multiple deposition notices, amended notices and related

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Date	Attorney/Other Prof	Hours	Description
			correspondence; review correspondence re depositions of Dr. Mayfield and Dr. Honeycutt; review correspondence from C. Dial re deposition of B. Nelson; review correspondence from C. Dial re deposition of L. Reaves
09/23/21	C. Dial	7.30	Deposition prep session with Ms. Schmidt; draft discovery responses to plaintiff's third requests for production; calendar deposition dates and prep dates; correspondence with C. Myers regarding uploading documents to relativity for tagging; correspondence with client regarding status of document gathering
09/23/21	G. Harper	8.40	Prepare for final deposition prep session meeting with Mrs. Schmidt; multiple calls with C. Dial re same; meet with Mrs. Schmidt to prepare for her deposition; review and respond to email from opposing counsel re alleged failure to cure redaction issue; call with C. Dial re same; call and email with team re upcoming depositions and coverage for same; locate documents for meeting with witnesses to prepare for depositions; review client documents [REDACTED]; multiple calls and emails re deposition issues and document concerns
09/23/21	E. Pratt	0.40	Load and QC documents to Relativity
09/23/21	C. Spangler	0.40	Review communications re responses to discovery requests
09/23/21	S. Stodghill	2.70	Telephone call re scheduling depositions and other discovery issues in case; telephone call to G. Harper re multiple issues related to deposition preparation, deposition scheduling, discovery disputes, document production issues and expert issues; review multiple correspondence and materials re same; telephone call from G. Harper re same; review correspondence from S. Gray re identities of persons who filed event reports against Dr. Thomas and related investigations;

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Date	Attorney/Other Prof	Hours	Description
			review correspondence from S. Gray re document issues in case; review correspondence from G. Harper re same; telephone call with G. Harper re deposition and document production issues in case
09/24/21	C. Dial	7.50	Draft discovery responses to plaintiff's third requests for production; correspondence with C. Myers regarding uploading documents to relativity for tagging; correspondence with client regarding status of document gathering; prepare final production set and responses and objections to plaintiff's second requests for production to Cook and first requests to individual defendants; send final production to opposing counsel; call with G. Harper regarding next steps for discovery
09/24/21	G. Harper	5.60	Review email from opposing counsel re alleged failure to revise redactions; research re same; gather sample of proper redactions and email Mrs. Gray re results of research and inaccuracy of her allegations re redactions.; review correspondence from opposing counsel re Plaintiff's Physician Performance File; email with clients re same; draft and edit Cook Children's Health Care System's responses to Plaintiff's Second Set of Requests for Production; draft and edit Cook Children's Physician Network's responses to Plaintiff's Second Set of Requests for Production; draft and edit Cook Children's Medical Center's responses to Plaintiff's Second Set of Requests for Production; draft and edit Donald Beam's responses to Plaintiff's First Set of Requests for Production; draft and edit Larry Reaves' responses to Plaintiff's First Set of Requests for Production; draft and edit Nancy Cychol's responses to Plaintiff's First Set of Requests for Production' draft and edit Rick Merrill's responses to Plaintiff's First Set of Requests for Production; draft and edit W. Britt Nelson's responses to Plaintiff's First Set of Requests for Production; multiple calls with C. Dial re discovery responses; multiple calls and emails with clients re same; research re same; call

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Date	Attorney/Other Prof	Hours	Description
			with team re documents to produce; review and respond to multiple emails from Ms. Gray re alleged discovery deficiencies and threat to cancel depositions of Ms. Schmidt and Mr. Gallagher; call with Mrs. Wardell re same
09/24/21	C. Spangler	0.50	Communications re document production issues, depositions; review discovery responses
09/24/21	S. Stodghill	3.90	Telephone call to G. Harper re staffing of deposition preparation sessions and defense of depositions; review multiple correspondence re same; review correspondence from S. Gray re redaction of documents in preparation for depositions; review correspondence from S. Gray to G. Harper re same; review correspondence re deposition of J. Gallagher; review correspondence from G. Harper re redaction to documents; review correspondence from S. Gray re same; review correspondence from G. Harper re same; review correspondence from G. Harper to clients re Physicians Performance File of Dr. Thomas; review documents in case to be used in deposition; review correspondence from S. Gray re discovery disputes and potential motion to compel; review correspondence from S. Gray re same; review correspondence from S. Gray to G. Harper re same; review correspondence from G. Harper to S. Gray re same; review correspondence from S. Gray to G. Harper re same; telephone call to G. Harper re same; review correspondence from c. Hopkins re scheduling of J. Gallagher deposition; correspondence re same; review correspondence re deposition of B. Schmidt; review correspondence from C. Dial re same; review correspondence from C. Spangler re same; review correspondence from C. Hopkins re same; review correspondence from S. Gray re rescheduling of deposition of J. Gallagher and B. Schmidt; correspondence with G. Harper re same; review correspondence from G. Harper re same; telephone call to G. Harper re potential cancellation of depositions; review

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00004 Cook Childrens v Dr. Patrick Thomas

Date	Attorney/Other Prof	Hours	Description
			correspondence from S. Gray re same; review correspondence from G. Harper to S. Gray re depositions of B. Schmidt and J. Gallagher; review correspondence from S. Gray re same; review correspondence from C. Dial re document production; review defendant's seventh set of document production and related correspondence from C. Dial; review supplemental discovery response and correspondence from G. Harper to S. Gray; review correspondence from S. Gray re rescheduling of depositions; review correspondence from G. Harper to S. Gray re same
09/27/21	C. Dial	6.70	Draft discovery responses to plaintiff's fourth requests for production; correspondence with C. Myers regarding uploading documents to relativity for tagging; correspondence with client regarding status of document gathering; prepare final production set and responses and objections to plaintiff's third requests for production; send final production to opposing counsel; call with G. Harper regarding next steps for discovery
09/27/21	G. Harper	5.90	Draft and edit responses to Third Requests for Production to corporate defendants; email with C. Dial re same; review correspondence from Ms. Hopkins re meet and confer issues with discovery; respond to same; multiple calls with C. Dial re same and things to do; review correspondence from client re questions on documents to gather for newest requests for production; call and email with C. Dial re same; respond to client re same; review client documents re [REDACTED]; multiple calls with client and team re deposition issues; research re document privilege issues
09/27/21	C. Spangler	0.50	Conference with G. Harper re discovery issues, summary judgment
09/27/21	S. Stodghill	2.60	Review correspondence re deposition preparation for J. Gallagher; review correspondence from G.

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Date	Attorney/Other Prof	Hours	Description
			Harper re meet and confer; review correspondence from opposing counsel re same; review correspondence from C. Spangler re same; review correspondence from opposing counsel re redaction to documents and discovery issues; review correspondence re cancellation of J. Gallagher deposition by C. Dial; review correspondence from C. Dial re cancellation of B. Schmidt deposition; review correspondence from S. Gray re Hopkins email and multiple discovery issues; review correspondence from C. Dial re document production in case; review recently produced documents and related correspondence from C. Dial; review multiple discovery responses to plaintiff's third request for production of documents and related correspondence from C. Dial; review correspondence from S. Gray re discovery issues in case; telephone call with G. Harper re same; review materials related to deposition preparation for multiple witnesses; review materials for deposition preparation of Dr. Fine
09/28/21	C. Dial	6.00	Draft discovery responses to plaintiff's fourth requests for production; call and correspondence with C. Myers regarding various discovery issues and reproducing certain documents; correspondence with client regarding status of document gathering; call with G. Harper regarding next discovery steps
09/28/21	G. Harper	7.40	Review correspondence from Ms. Gray re issues with discovery and demand for unredactions; review documents referenced by Ms. Gray; email Ms. Gray re results of review; call with C. Dial re same and status of document production; review production documents re issues raised by Ms. Hopkins and possible "doctor key" for redactions; email Ms. Hopkins re proposed solution re same and request for comments on same; prepare for and attend conference call with opposing counsel re discovery issues and meet and confer on same;

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Date	Attorney/Other Prof	Hours	Description
			review correspondence from Ms. Gray re issues with bates numbering of documents; confirm that issues are not within production; call with C. Dial re same; respond to Ms. Gray re same and solution to her issues; multiple calls and emails with Ms. Gray re same; multiple emails with team re same; review email from Ms. Gray re issue with production of email attachments; review production to research attachment issue; email Ms. Gray to confirm existence of issue and assurance of curing same; call with C. Dial re work needed to fix document issues; review and respond to multiple emails from Ms. Gray raising other discovery concerns; multiple emails with team and clients re same; review redacted production documents and create "key chart" re same; email opposing counsel re chart format and any changes needed/wanted
09/28/21	S. Stodghill	3.50	Review correspondence re fourth request for production response; review correspondence from C. Hopkins re rule 11 agreement; review correspondence from S. Gray re eight set of responses to requests for production; review correspondence re scheduling depositions; telephone call to G. Harper re same and document request responses; review correspondence from S. Gray re multiple document discovery issues; review correspondence from G. Harper to S. Gray re attachment to document production; review correspondence from G. Harper to S. Gray re redaction to document production; review correspondence from S. Gray re same; review correspondence from G. Harper to S. Gray re document production; review correspondence from G. Harper to S. Gray re document production issues; review correspondence from S. Gray to G. Harper re defendants seventh and eighth set responses to discovery; review correspondence from G. Harper re same; review correspondence from G. Harper to S. Gray re bates number issues in production; telephone call with G. Harper re

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Date	Attorney/Other Prof	Hours	Description
			same; review correspondence from G. Harper to opposing counsel re document production issues; review correspondence from G. Harper to S. Gray re privilege log; review correspondence from G. Harper to opposing counsel re meet and confer; review correspondence from G. Harper to S. Gray re scheduling depositions; review correspondence from S. Gray re deposition of additional expert; review correspondence from opposing counsel re meet and confer; review correspondence from G. Harper to S. Gray re same; review correspondence from G. Harper to S. Gray re same; review correspondence from S. Gray to G. Harper re same; review correspondence from opposing counsel re scheduling meet and confer; review correspondence from opposing counsel re discovery agreements; review correspondence from S. Gray re document production issues; review correspondence from C. Hopkins re same
09/29/21	C. Dial	7.70	Draft discovery responses to plaintiff's fourth requests for production; call and correspondence with C. Myers regarding various discovery issues and reproducing certain documents; correspondence with client regarding status of document gathering; call with G. Harper regarding edits to responses to discovery requests; revise responses per G. Harper's revisions; finalize discovery responses and serve to opposing counsel; review third production set for redaction status
09/29/21	G. Harper	3.90	Email opposing counsel re discovery issues and continuance questions; call and email with Mrs. Wardell re same; draft and edit responses to Plaintiff's Fourth Request for Production of Documents; call and email with C. Dial re same; review client redacted documents to create "doctor key" re same; multiple call with clients and team re same; call with S. Stodghill re case strategy and status; call with Mrs. Wardell re continuance issues; call with S. Stodghill re same; call with S.

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Date	Attorney/Other Prof	Hours	Description
			Stodghill re same; multiple emails with opposing counsel re same and form of motion needed
09/29/21	C. Spangler	0.80	Communications re depositions, discovery issues
09/29/21	S. Stodghill	2.30	Telephone call to G. Harper re meet and confer with opposing counsel, document redaction, discovery deadlines, scheduling depositions, preparation for same, trial date, potential motion for continuance or, alternatively, motion for summary judgment deadline and expert issues; review multiple correspondence re same; telephone call with G. Harper re same; telephone call from G. Harper re same and potential deadlines and trial date in case; telephone call to G. Harper re same; telephone call to C. Dial re multiple discovery issues in case, document disputes, redactions, deposition preparation and other issues; review chart from opposing counsel re physician discovery issues; review correspondence re same; review correspondence from C. Dial re defendant's third set of document production and related issues; review correspondence from C. Dial re same
09/30/21	C. Dial	7.30	correspondence with C. Myers regarding reproducing third production set with corrected redactions; call with G. Harper regarding research [REDACTED]; reproduce third production set and serve to opposing counsel; review fourth production set for redaction status; review produced emails and attachments for corrected reproduction; research case law [REDACTED]
09/30/21	G. Harper	6.90	Research re continuance issues; multiple calls with former clerk re [REDACTED]; call with Mrs. Wardell re motion and affidavit for same; research re motion; draft and edit Declaration of Mrs. Wardell; research re facts for same; multiple calls and emails with Mrs. Wardell re same; draft

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Date	Attorney/Other Prof	Hours	Description
			and edit motion to extend deadlines and continue; research re same; multiple calls with C. Spangler re same; call with S. Stodghill re same; multiple emails with opposing counsel re document production issues; multiple calls and emails with opposing counsel re motion for continuance; review declaration of Patrick Thomas; incorporate same into motion; multiple emails with opposing counsel re deposition of Dr. Thomas and status of same
09/30/21	C. Spangler	0.70	Conferences re discovery issues, motion for continuance
09/30/21	S. Stodghill	2.90	Telephone call to G. Harper re motion for continuance, affidavits in support of same by K. Wardell and Dr. Thomas, scheduling of depositions and deposition preparation, staffing of same and related issues; review multiple responses to plaintiff's fourth request for production of documents; review correspondence from C. Dial re same; correspondence with C. Dial re same; review correspondence from G. Harper to S. Gray re motion for continuance and multiple discovery issues in case; telephone call to G Harper re motion for continuance; review correspondence from S. Gray re Dr. Thomas deposition, discovery disputes in case and motion for continuance; review correspondence and materials from G. Harper to S. Gray re motion for continuance, declarations and document discovery issues; review correspondence from S. Gray re motion for continuance and discovery disputes; review Dr. Thomas draft declaration and related materials; review multiple materials in support of motion for continuance
Total Hours		305.10	

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Sub-Total Legal Services	\$281,958.50
Less 10% Discount	(28,195.85)
Total for Legal Services	\$253,762.65

Timekeeper Summary

<u>Attorney/Other Prof</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees Billed</u>
S. Stodghill	62.10	1,245.00	77,314.50
C. Spangler	17.80	965.00	17,177.00
G. Harper	105.80	1,085.00	114,793.00
C. Dial	119.00	610.00	72,590.00
E. Pratt	0.40	210.00	84.00
Total Attorney/Other Prof	305.10		281,958.50

Disbursements & Other Charges

Description	Amount
Electronic Discovery Services	3,052.25
Total Disbursements & Other Charges	\$3,052.25

Total Due This Invoice	\$256,814.90
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WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900
 Dallas, Texas 75201
 TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice # 2826788
 Invoice Date 10/26/21
 Client Matter No. 180333.00004

Client Remittance Copy

Total Fees	\$253,762.65
Total Disbursements & Other Charges	3,052.25
Total Due This Invoice	\$256,814.90

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
Via Mail: Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	Via Delivery Service: Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
Karen Wardell
801 Seventh Avenue
Fort Worth, TX 76104

Invoice # 2826788
Invoice Date 10/26/21
Client Matter No. 180333.00004

Remittance Advice

Please include this remittance page with your payment

Total Fees	\$253,762.65
Total Disbursements & Other Charges	3,052.25
Total Due This Invoice	\$256,814.90

Payment Terms: Net 30 Days

Remittance Address		For Wire Transfers/ACH Payments
Via Mail: Winston & Strawn LLP P.O. Box 36235 Chicago, IL 60694-6235	Via Delivery Service: Conduent c/o BMO Harris Lockbox #36235 141 W. Jackson Blvd/Suite 1000 Chicago, IL 60604	BMO Harris Bank N.A. Chicago, IL ABA/Routing Number: 071 000 288 Account Number: 449-675-8 Account Name: Winston & Strawn LLP SWIFT Code: HATRUS44 (International Wires) Please reference invoice/client matter number.

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, Texas 75201

TAX ID NO. 36-1975990

Cook Children's Health Care System
 Karen Wardell
 801 Seventh Avenue
 Fort Worth, TX 76104

Invoice No. 2836373
 Invoice Date 12/10/21
 Client Matter No. 180333.00004

For Legal Services Rendered Through October 31, 2021 In Connection With:

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Date	Attorney/Other Prof	Hours	Description
10/01/21	C. Dial	6.90	Review and revise joint motion for continuance; send revisions to G. Harper for review; draft proposed order and send to G. Harper for review; correspondence with G. Harper and C. Myers regarding production of emails with corresponding attachments; review new event reports for relevancy and production; review fourth production for corrected redacted documents
10/01/21	G. Harper	10.20	Draft and edit motion to continue trial and move deadlines; research re same; multiple calls and emails with Mrs. Wardell re same; draft and edit declaration of Mrs. Wardell in support of motion to continue; multiple call and emails to opposing counsel re status of motion and changes needed to same; research re local rules re motions to continue; call with Mrs. Wardell re signature needed for clients on motion; research re motion; revise same; correspond with opposing counsel re same; review correspondence from client re proposed changes to Wardell declaration; revise same; multiple calls and emails with S. Stodghill re motion and status of same; review and respond to multiple emails from opposing counsel re changes proposed to motion; review and respond to email from C. Dial reorder on motion to continue; review and respond to email from opposing counsel re proposed changes to Wardell affidavit; call with client re same; call with team re same; review proposed changes to motion from opposing counsel; call with counsel re same; call with clients re status of motion and things to do;

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Date	Attorney/Other Prof	Hours	Description
			select exhibits for motion; review declaration of Plaintiff; multiple calls and emails with C. Dial re issues with motion to continue and things to do; call with clients re same; call with S. Stodghill re court order on motion to continue and hearing scheduled for same; call with K. Wardell re same
10/01/21	C. Spangler	1.30	Conference with G. Harper re motion for continuance and research re same
10/01/21	S. Stodghill	2.50	Review revised declaration of K. Wardell; review correspondence from G. Harper re same; review correspondence re motion for continuance from S. Gray; review multiple correspondence from G. Harper re motion for continuance and related declarations; telephone call to G. Harper re same; review correspondence from G. Harper to S. Gray re motion for continuance; review correspondence from S. Gray re same; review correspondence re filing final motion to modify scheduling order and continue trial; review correspondence from G. Harper re same; correspondence with G. Harper re same; review correspondence from C. Dial re defendant's production of emails with attachments; review related correspondence from C. Dial re same; review proposed order on motion to modify scheduling order and related correspondence from C. Dial; review notices from the Court and related correspondence; review correspondence from K. Wardell re joint motion to extend case deadlines and continue trial; telephone call with G. Harper re same; review correspondence from C. Dial re revisions to joint motion to extend case deadlines and continue trial; review correspondence from G. Harper re same; review correspondence from G. Harper re same

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10/02/21	G. Harper	5.30	Prepare for hearing on motion to continue; multiple calls with S. Stodghill re same; correspond with clients re same; draft and edit doctor key for discovery; review all produced documents re same
10/02/21	S. Stodghill	1.10	Review order of the Court referring ruling on motion for continuance and setting a hearing date; review notice from the Court re same; review correspondence re same; correspondence with client re same; telephone call to G. Harper re same; review correspondence from K. Wardell re same; correspondence with K. Wardell re same
10/03/21	C. Dial	0.60	Call with G. Harper regarding the court's order and upcoming hearing and preparations needed for hearing
10/03/21	G. Harper	4.90	Prepare for hearing on motion to continue; review documents and create physician key
10/03/21	S. Stodghill	1.30	Telephone call with G. Harper re preparation for hearing on motion for continuance; review multiple correspondence re same; review correspondence re preparation for hearing with S. Gray; telephone call with G. Harper re spreadsheet for physician identification related to document production; review materials re same
10/04/21	C. Dial	7.80	Pull relevant documents and cases for hearing regarding motion for continuance; review served discovery and total for hearing; correspondence with C. Myers regarding reproduction of fourth set; reproduce fourth set of production to opposing counsel to correct all redaction errors; review produced documents for redactions for privilege for privilege log
10/04/21	G. Harper	7.90	Continue work on peer review key chart; research re same; multiple emails with clients re data needed on doctors for same; revise and finalize key chart; prepare for hearing on motion to continue and extend trial deadlines; multiple emails and

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calls with opposing counsel re same; multiple calls and emails with team re same; call with S. Stodghill re hearing strategy; call with clients re same; multiple calls and emails with C. Dial re hearing, case strategy, and things to do; attend hearing; call with clients re same; review email from opposing counsel re document issues; call and email with C. Dial re same; research re Section 1981 liability and new opinions on same; research re hospital privileges and contractual basis for same; call and email with C. Dial re document discovery issues; review and respond o email from client re same

10/04/21 C. Spangler

0.50 Communications re motion for continuance and discovery schedule

10/04/21 S. Stodghill

2.90 Telephone call to G. Harper in preparation for hearing on motion for continuance and related to duplicated production re physician identification; review multiple correspondence re same; telephone call with G. Harper re multiple issues in preparation for hearing and S. Gray position on motion for continuance; review correspondence from A. Wright re materials for discovery production; review correspondence from K. Wardell re same; review correspondence from G. Harper re same; review chart of "complained of person" from G. Harper to S. Gray; review related correspondence from G. Harper to S. Gray re same; review correspondence from G. Harper re hearing; telephone call to G. Harper re hearing on motion for continuance; review correspondence from S. Gray re Dr. Thomas position on motion for continuance; review correspondence from G. Harper to S. Gray re same; review correspondence from S. Gray re same; review correspondence from S. Gray to C. Dial re defendant's fourth set of document production; review correspondence from C. Dial to S. Gray re same; review correspondence from C. Dial to S. Gray re same; review correspondence from S. Gray re same; review correspondence from C. Dial re same; review correspondence from C. Dial re document

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production and response to fourth request for production from Dr. Thomas; review notice from the Court, recent filings and related correspondence

10/05/21 C. Dial

8.80 Review produced documents for redactions for privilege for privilege log; call with G. Harper regarding deposition preparation with Ms. Cychol; gather all documents produced and not produced in this matter concerning N. Cychol and send to G. Harper; research standard for individual liability under Section 1981; call with Ms. Nettle and Ms. Gaile regarding gathering documents in response to final sets of requests for production

10/05/21 G. Harper

8.80 Draft email to Ms. Birney re case status and things to do; review and respond to multiple emails from Ms. Gray re various discovery issues; multiple calls and emails with C. Dial re deposition issues, court hearing, and case strategy; review and respond to email from opposing counsel re court ordered status report; draft same; review and respond to email from Mrs. Hopkins re status of discovery and things to do; call with clients and team re discovery responses and documents needed; multiple emails with Ms. Gray re deposition issues; review and respond to multiple emails from opposing counsel re numerous discovery disputes and defendants' position on same; call and emails with clients re same and case strategy; prepare for deposition preparation meeting with Mrs. Cychol; research re same; review client documents re same; attention to issues with deposition of Dr. Thomas; multiple calls and emails with Nebraska counsel re office rental re same; review and respond to email from Ms. Hopkins re conference on issues with physician key and redactions; review court order on motion to continue; call and email clients re same; multiple calls with team re same; multiple calls and emails with opposing counsel re impact of court order on Thomas deposition; multiple calls and emails with team re same; multiple calls with clients re same

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10/05/21	C. Spangler	0.50	Communications re discovery issues
10/05/21	S. Stodghill	4.50	<p>Review correspondence from A. Graben re deposition of Dr. Thomas; review correspondence from G. Harper re same; review correspondence from A. Graben re same; review correspondence from G. harper re same; review correspondence from G. Harper to S. Gray re multiple discovery issues in case; review correspondence from opposing counsel re multiple discovery issues to G. Harper; review correspondence from C. Dial re document production; review correspondence from C. Dial re supplemental document production; review correspondence from G. Harper to S. Gray re multiple discovery issues; telephone call to G. Harper re same; and preparation for Dr. Thomas deposition; review materials in preparation for deposition of Dr. Thomas; review correspondence from G. Harper to S. Gray re deposition of Thomas Roney; review correspondence from S. Gray to G. Harper re motion to compel; review order of the Court, notice from the Court and related correspondence; review correspondence from G. Harper to opposing counsel re motion to compel; review notice from the Court, recent filings and related correspondence; review correspondence from opposing counsel re motion to compel and meet and confer; review correspondence from G. Harper re deposition preparation issues; review correspondence from S. Gray re issues in case; review correspondence from G. Harper to S. Gray re joint motion to extend deadlines; review correspondence from G. Harper re issues in case; review correspondence from G. Harper to S. Gray re multiple discovery issues in case; review correspondence from S. Gray re multiple issues in case related to discovery; telephone call to G. Harper re discovery dispute in case and Court Order; review correspondence from G. Harper and related materials to K. Wardell; review correspondence re deadlines in case; review correspondence from S. Gray re scheduling of depositions; review correspondence from G.</p>

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Harper to clients re Court Order; review correspondence re discovery deadlines in case; review correspondence from S. Gray re Dr. Thomas deposition; review correspondence from S. Gray re same; review correspondence from G. Harper to S. Gray re scheduling of depositions; review correspondence from G. Harper to K. Wardell re materials from Dr. Thomas; review correspondence from K. Wardell re same; review correspondence from G. Harper to K. Wardell re same; review correspondence in case; review correspondence re scheduling and deadlines in case

10/06/21	A. Aurisch	0.10	Review status of depositions
10/06/21	C. Dial	10.30	Call with G. Harper regarding deposition preparation with Ms. Cychol; deposition prep with Ms. Cychol; gather documents in chronological order for plaintiff's deposition
10/06/21	W. Hamilton	0.60	Confer with G. Harper re discovery requests for peer review committee documents and additional depositions
10/06/21	G. Harper	7.70	Prepare for meeting with Nancy Cychol re deposition preparation; email with opposing counsel re deposition of Mr. Roney; email with Mr. Millican re deposition issues; email with Dr. Reynolds re same; multiple emails with Ms. Maile re deposition issues; research re same; review and respond to email from Ms. Hopkins re discovery dispute and depositions; multiple calls and emails with witnesses re deposition status; email opposing counsel re scheduling dates for same; review and respond to opposing counsel re deposition issues for Dr. Thomas; meet with clients re plaintiff's request for additional depositions; email with opposing counsel re same; meet with Mrs. Cychol re deposition preparation; multiple calls and emails with team re same; work on discovery issues and document redaction

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10/06/21	C. Spangler	1.00	Conferences and communications with G. Harper, team re discovery, plaintiff's deposition
10/06/21	S. Stodghill	3.90	Telephone call to G. Harper re court order on deadlines, discovery disputes, scheduling of depositions, preparation for deposition of Dr. Thomas and preparation for response to motion to compel; telephone call from G. Harper re same; telephone call to W. Hamilton re response preparation for motion to compel by Dr. Thomas; review multiple materials and correspondence re scheduling of depositions in case; multiple correspondence re same; telephone call re Dr. Thomas deposition; review correspondence re response to Dr. Thomas 5th and 6th requests for production of documents; review response to G. Maile from G. Harper re scheduling and preparation of multiple Cook Children's depositions; review correspondence from G. Harper to S. Gray re scheduling of expert interview of T. Roney; review correspondence from opposing counsel re discovery disputes in case; review correspondence from G. Harper to S. Gray re multiple discovery disputes in case; correspondence re response to anticipated motion to compel from Dr. Thomas; telephone call with W. Hamilton re motion to compel research; review correspondence from G. Harper to S. Gray re deposition of Rhodes and Iglesias; review correspondence re scheduling of depositions; telephone call to G. Harper re multiple issues in case; review amended notice of deposition of Dr. Thomas and related correspondence from C. Dial; review correspondence from G. Harper to S. Gray re discovery issues in case; review correspondence from S. Gray re same; review correspondence from G. Harper to S. Gray re request for 15 depositions; review correspondence from G. Harper to S. Gray re discovery dispute issues in case; telephone call to G. Harper re same and response to motion to compel research; review correspondence re scheduling of depositions in case; review related correspondence re scheduling of deposition of G.

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Maile; review correspondence from G. Harper to opposing counsel re discovery dispute issues in case; review correspondence from G. Harper re preparation for deposition of Cook Children's employees; correspondence with G. Harper re same

10/07/21	C. Dial	7.60	Call with G. Harper regarding deposition preparation plaintiff's deposition; gather documents in chronological order for plaintiff's deposition and send to G. Harper and S. McMillen for printing; gather documents for Mr. Beam's deposition prep session; review motion to compel and order to respond to motion to compel
10/07/21	W. Hamilton	2.90	Research discovery issues re peer review confidentiality and additional depositions; confer with G. Harper re same
10/07/21	G. Harper	6.80	Review and respond to email from W. Hamilton re research needed re expected motion to compel; call with C. Spangler re case strategy and plan for motion for summary judgment; email with clients re additional documents needed; call with S. Stodghill re case status, strategy, and things to do; review and respond to email from M. Woodrum re things to do; call with M. Woodrum re same; multiple calls and emails re issues with logistics for deposition of Dr. Thomas; prepare for Thomas deposition; review documents re same; research re same; call with S. McMillan re issues with court reporter for Thomas deposition; call and email with clients re same; call with S. Stodghill re same; email to opposing counsel re need for remote deposition
10/07/21	S. Lemajeur	1.30	Discuss case strategy and planning for upcoming summary judgment motion with C. Spangler, C. Dial, and G. Harper; analyze case law re hospital privileges are not adverse employment decisions
10/07/21	C. Spangler	3.30	Analysis and conference re summary judgment briefing

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10/07/21	S. Stodghill	2.30	Telephone call with G. Harper re deposition preparation for Dr. Thomas, response to motion to compel, drafting of motion for summary judgment, discovery disputes and scheduling of depositions; review numerous correspondence re discovery issues and disputes in case; multiple correspondence re same; multiple telephone calls to G. Harper re same
10/07/21	M. Woodrum	0.70	Confer with Claire Dial re preparation for summary judgment motions
10/07/21	M. Woodrum	0.20	Confer with Steve Stodghill re preparation for summary judgment motions
10/07/21	M. Woodrum	1.60	Analyze pleadings and prior motions in preparation for further discover and summary judgment motions
10/07/21	M. Woodrum	1.00	Meet with Geoff Harper, Cardelle Spangler, Clair Dial, and Shannon Denise to discuss strategy for summary judgment motion and pending tasks
10/08/21	C. Dial	7.50	Call with G. Harper regarding deposition preparation for plaintiff's deposition and additional documents needed; gather documents in chronological order for plaintiff's deposition and send to G. Harper and S. McMillen for printing; review newly produced documents from plaintiff for relevant documents to plaintiff's deposition; begin drafting responses to plaintiff's fifth requests for production
10/08/21	M. Gaddis	12.30	Review motion to compel; call G. Harper and S. Stodghill to discuss same; communicate with C. Dial and W. Hamilton re research tasks; review exhibits to plaintiff's motion; review discovery correspondence and other pertinent materials; request hearing transcript; research and review case law on confidentiality and privilege issues relating to medical peer review; outline issues for response brief

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10/08/21	W. Hamilton	1.10	Assist in preparing response to MTC re peer review documents
10/08/21	G. Harper	8.90	Prepare for deposition of Dr. Thomas; research re same; multiple emails and phone calls with opposing counsel re issues with deposition logistics; multiple calls and emails with clients re same; multiple emails and calls with teams re same; prepare deposition outline; call and emails with C. Spangler re same; review motion to compel and court order re same; call with clients re same; multiple emails with team re same and strategy for response; multiple calls and emails with S. Stodghill re deposition and motion to compel; research re motion to compel; review and respond to email from opposing counsel re Cychol deposition; call with client re same; review plaintiff's amended interrogatory responses; email with clients re same; call with team re same; review new documents and affidavits produced by plaintiff; call and email clients re same
10/08/21	C. Spangler	0.70	Review and comment upon deposition outline
10/08/21	S. Stodghill	4.40	Review multiple correspondence and materials in preparation for deposition of Dr. Thomas; review correspondence from opposing counsel re deposition of N. Cychol; review Dr. Thomas supplemental interrogatory responses and related correspondence from opposing counsel; review draft outline for deposition of Dr. Thomas and related correspondence from G. Harper; correspondence re comments to same; telephone call to G. Harper re same and other issues in case; correspondence with C. Spangler re questions and topics of inquiry for Dr. Thomas deposition; review correspondence from G. Harper to S. Gray re deposition of Dr. Thomas; review related correspondence; review correspondence from G. Harper to C. Hopkins re deposition of Dr. Thomas; review correspondence from C. Hopkins re same; review correspondence from S. Gray re deposition of Dr. Thomas; review correspondence from C.

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Hopkins re deposition of Dr. Thomas; review notice from the Court, order deferring ruling on motion to compel responses and related correspondence; telephone call to G. Harper re response to motion to compel; telephone call to W. Hamilton re legal research related to same; review correspondence from G. Harper re deposition of Dr. Thomas; review correspondence from C. Hopkins re motion to compel and proposed order; review motion to compel and proposed order; review notice from the Court, recent filings and related correspondence; telephone call to G. Harper re response to motion to compel; telephone call to C. Dial re same; telephone call to M. Gaddis re same; review correspondence from G. Harper re same; correspondence with G. Harper re same; review memorandum from W. Hamilton re legal research in response to motion to compel; correspondence with W. Hamilton re same; review correspondence from C. Hopkins re document discovery issues; review correspondence from C. Spangler re Dr. Thomas deposition outline; review correspondence from G. Harper to C. Hopkins re deposition of Dr. Beam; review correspondence from C. Dial re documents and correspondence related to motion to compel; review correspondence from G. Harper re same; review correspondence from M. Gaddis re same; review correspondence from G. Harper re same; review correspondence from W. Hamilton re same; review correspondence from C. Hopkins; review correspondence from G. Harper; review correspondence from G. Harper re motion to compel; review correspondence from G. Harper re Dr. Thomas deposition; review correspondence from W. Hamilton re same

10/08/21 M. Woodrum

2.10 Research [REDACTED]

10/09/21 M. Gaddis


2.90 Continue work on response to motion to compel

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10/09/21	G. Harper	16.90	Prepare for deposition of Dr. Thomas; gather and prepare exhibits re same; travel to Omaha for deposition; depose Dr. Thomas; multiple calls with clients and team re same; call with team re motion to compel and issues re same
10/09/21	C. Spangler	1.20	Analysis and communications with G. Harper re P. Thomas deposition
10/09/21	S. Stodghill	2.70	Conference call re response to motion to compel; review multiple correspondence re same; multiple correspondence re same; review multiple documents and correspondence related to response to motion to compel; review correspondence re document production in case; multiple telephone calls re response to motion to compel; review multiple correspondence from G. Harper re deposition of Dr. Thomas; multiple correspondence with G. Harper re deposition of Dr. Thomas; telephone calls to G. Harper re deposition of Dr. Thomas
10/10/21	C. Dial	2.00	Draft summary chart of all production sets to date with total page numbers; correspondence with M. Gaddis regarding additional details needed for chart; draft responses to plaintiff's fifth requests for production
10/10/21	M. Gaddis	11.80	Continue work on response to motion to compel; call G. Harper to discuss same; review pertinent documents and communications; research and review additional case law 
10/10/21	W. Hamilton	3.40	Assist in preparing response to MTC re peer review documents

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10/10/21	G. Harper	4.60	Work on response to motion to compel; multiple calls with client and team re same and issues with Dr. Thomas deposition; travel from Omaha; email with opposing counsel re authenticity issues for documents; call with S. Stodghill re case strategy and things to do; draft email to team re new discovery needed
10/10/21	S. Stodghill	1.70	Review transcript of hearing, notice from the Court and related correspondence; multiple telephone calls re response to motion to compel; telephone call to G. harper re deposition of Dr. Thomas and discovery disputes
10/11/21	C. Dial	7.50	Call with G. Harper regarding additional motions and discovery needed in light of plaintiff's deposition conduct; call with G. Harper and M. Woodrum regarding [REDACTED]; draft responses and objections to plaintiff's fifth requests for production; draft responses and objections to plaintiff's second interrogatories; correspondence with Ms. Maile and Ms. Nettle regarding status of document production and answers to interrogatories
10/11/21	M. Gaddis	12.30	Continue work on response to motion to compel; call G. Harper to discuss same; communicate with team re research and exhibits for same
10/11/21	W. Hamilton	1.90	Assist in preparing response to MTC re peer review documents
10/11/21	G. Harper	6.90	Review and respond to correspondence from M. Gaddis re response to motion to compel; review and edit factual background of motion; review correspondence from M. Gaddis re proposed changes to physician key; review client documents re same; respond to M. Gaddis re difficulties with proposed changes and impact on litigation; review and respond to correspondence from S. Stodghill re discovery strategy; call with C. Dial re same; review and edit response to motion to compel;

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multiple calls and emails with S. Stodghill re same; multiple calls with M. Gaddis re changes to response; revise factual outline; research correspondence and email re same

10/11/21	C. Spangler	1.20	Analysis and communications re additional offensive discovery and outstanding discovery responses
10/11/21	S. Stodghill	3.50	Telephone call with G. Harper re multiple issues in case, including deposition of Dr. Thomas, response to motion to compel, defending motion to compel, preparation for depositions and draft motion for summary judgment; review multiple correspondence and materials re same; review correspondence from C. Spangler re multiple discovery issues in case and motion to compel; review memorandum from G. Harper re discovery issues in case; correspondence with G. Harper and C. Spangler re same; telephone call re same; review correspondence from G. Harper to S. Gray re multiple discovery issues in case; review correspondence from G. Harper re discovery issues in case; review correspondence from M. Gaddis and materials for response to motion to compel; correspondence with M. Gaddis re same; review correspondence from G. Harper re same; review draft response to motion to compel and revisions to same; review multiple correspondence re same
10/11/21	M. Woodrum	0.50	Phone conference with G. Harper and C. Dial re discovery requests
10/11/21	M. Woodrum	0.50	Legal research re [REDACTED]
10/11/21	M. Woodrum	5.20	Factual investigation re [REDACTED] [REDACTED]

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10/12/21	C. Dial	7.70	Correspondence with M. Gaddis and G. Harper regarding finalizing response to motion to compel and attaching exhibits in support; deposition prep meeting with Dr. Beam; correspondence with Ms. Nettle and Ms. Maile regarding outstanding documents responsive to requests; finish responses and objections to interrogatories and send to G. Harper for review
10/12/21	M. Gaddis	13.90	Review and revise draft response to Plaintiff's motion to compel; communicate with G. Harper re same; review additional counsel communications and prepare appendix of exhibits for same; finalize and file same
10/12/21	G. Harper	8.20	Prepare for meeting with Don Beam; revise factual outline for response to motion to compel; research correspondence and email re same; multiple calls and emails with M. Gaddis re motion strategy and changes needed; email with opposing counsel re Beam deposition; multiple calls and emails with clients re same; review and respond to correspondence from opposing counsel re Beam deposition and other discovery issues; call with clients re same; meet with Mr. Beam to prepare for deposition; review correspondence from M. Gaddis re exhibits needed for motion; research file re exhibits and select same; review correspondence re Schmidt deposition preparation; call with C. Dial re same; call with G. Maile re same; review and edit response to motion to compel; correspond with Mrs. Wardell re same; multiple emails with client re Reaves deposition; prepare for meeting with Dr. Reaves re deposition; review client documents re same; continue to edit response to motion to compel; multiple calls and emails with M. Gaddis re same; multiple calls and emails with S. Stodghill re same; call with Mrs. Wardell re issues with response
10/12/21	D. Sloan	6.10	Prepare exhibits, finalize and file response brief with the Court.

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10/12/21	C. Spangler	1.00	Analysis and communications re interrogatories, potential requests for admission
10/12/21	S. Stodghill	4.30	Telephone call with G. Harper re response to motion to compel, discovery responses, supplementation of physician's list, motion for summary judgment, motion to compel Dr. Thomas, preparation for deposition transcript and video of Dr. Thomas' deposition, preparation for depositions of Cook Children's witnesses and discovery service deadlines; review correspondence from G. Harper and revised outline of factual background for response to motion to compel; review further revisions to factual background and related correspondence from G. Harper; review correspondence from G. Harper re deposition of Dr. Beam to S. Gray; review correspondence from S. Gray to G. Harper re cancellation of Dr. Beam, rescheduling deposition of Dr. Beam, proposed dates for N. Cychol, deposition of R. Rhodes and deposition of R. Merrill; correspondence with G. Harper and K. Wardell re deposition of J. Gallagher; review correspondence from G. Harper to S. Gray re deposition of R. Merrill and other depositions; review correspondence from K. Wardell re depositions of J. Gallagher and R. Merrill; correspondence with K. Wardell re same; telephone call with M. Gaddis re response to motion to compel; telephone call to C. Dial re multiple discovery issues in case; review multiple correspondence re same; review correspondence from S. Gray re deposition of T. Roney in case; review correspondence from M. Gaddis re response to motion to compel; correspondence with M. Gaddis and G. Harper re response to motion to compel filed by Dr. Thomas; further review materials, correspondence, documents and legal research related to response to motion to compel; multiple telephone calls re same; review draft list to subpoena from third parties and related correspondence from M. Woodrum; correspondence with M. Gaddis and G. Harper re response to motion to compel; review

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correspondence from M. Gaddis re same and revisions to response to motion to compel; telephone call re additional revisions and page limit details re same; review related correspondence

10/12/21	J. Vargo	1.60	Assist with exhibit preparation for Response to Motion to Compel; office conference with D. Sloane regarding same
10/12/21	M. Woodrum	5.50	Factual investigation re [REDACTED] [REDACTED]
10/12/21	M. Woodrum	0.20	Correspondence with C. Dial re factual investigation [REDACTED] [REDACTED]
10/12/21	M. Woodrum	0.50	Legal research re [REDACTED]
10/13/21	C. Dial	7.50	Gather documents relevant to Dr. Reaves deposition and send to G. Harper; deposition prep meeting with Dr. Reaves; correspondence with Ms. Nettle and Ms. Maile regarding outstanding documents responsive to requests; finish responses and objections to requests for production and send to G. Harper for review
10/13/21	M. Gaddis	2.40	Review discovery materials and document production
10/13/21	G. Harper	5.90	Attention to setting deposition of Mr. Merrill; email with B. Hunter re same; prepare for Reaves deposition; review correspondence from Mrs. Wardell re deposition status and discovery issues; research re same; draft and edit correspondence to Mrs. Wardell re same; meet with Dr. Reaves to prepare for deposition
10/13/21	S. Lemajeur	2.40	Discuss case developments with C. Dial; review pleadings; analyze Fifth Circuit caselaw re [REDACTED]

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10/13/21	C. Spangler	1.80	Review and comment upon initial research for section of summary judgment brief (.50); review and analyze plaintiff's reply to motion to compel and communications re response to same (1.30)
10/13/21	S. Stodghill	2.60	Telephone call with G. Harper re response to motion to compel, preparation for depositions, preparation of Cook motion to compel and motion for summary judgment; review correspondence from G. Harper re scheduling of deposition date of R. Merrill; telephone call with G. Harper re same; telephone call to G. Harper re same; review related correspondence; review notice from the Court, response by Cook Children's to motion to compel and related correspondence; review correspondence and materials re discovery disputes from C. Dial; review correspondence from G. Harper re motion to compel
10/13/21	M. Woodrum	6.60	Legal research re [REDACTED] [REDACTED]
10/14/21	C. Dial	8.50	Correspondence with G. Harper regarding responses and objections to plaintiff's last requests for production and interrogatories; review G. Harper's revisions and replicate for remaining defendants' responses and objections; review documents from client to ensure that responses are accurate; correspondence with G. Harper regarding drafting a privilege log
10/14/21	M. Gaddis	8.60	Review and analyze Plaintiff's reply in support of motion to compel; multiple calls and communications with team re same; prepare memo re same; review Judge O'Connor's order on motion to compel and communicate with team re strategy for same; review draft discovery topics for third party subpoenas; prepare notices and subpoenas for Thomas' employment agencies, prospective employers, current employer, and master's program